

# STATE OF TENNESSEE DEPARTMENT OF GENERAL SERVICES

BILL HASLAM GOVERNOR ROBERT E. OGLESBY, AIA

To: Ivan Greenfield

From: Cameron Himes

Re: Tennessee Department of Labor and Workforce Development revised subrecipient monitoring plan for FY 2015

Date: November 7, 2014

Dear Ivan:

The Central Procurement Office reviewed the revised subrecipient monitoring plan submitted by your agency containing the following changes:

1) Change Q3. Page 68

Has a veteran seeking any services been made aware of their entitlement to priority of service, and were they provided priority of service to adult program services?

2) Change Parameters to Q.3, page 68

Please check the priority status of veterans seeking services (referencing the Military Services form and DD214 as the attachment).

3) Military Service form attachment added, Page I 08.

These changes and monitoring plan are approved. Please contact me if you have any further questions.

Sincerely,

#### **Cameron Himes**

Grants Program Manager Central Procurement Office Department of General Services WRS Tennessee Tower, 3rd floor 312 Rosa Parks Ave., Nashville, 37243 (615) 532 - 6871

#### CENTRAL PROCUREMENT OFFICE



#### STATE OF TENNESSEE

# DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT

DIVISION OF WORKFORCE SERVICES 220 French Landing Drive Nashville, TN 37243-1002 (615) 741-1031

November 7, 2014

Mr. Cameron Himes Central Procurement Office Department of General Services 3<sup>rd</sup> Floor, WRS Tennessee Tower 312 Rosa L. Parks Avenue Nashville, TN 37243

Dear Mr. Himes:

Please find attached a revised 2015-16 Department of Labor and Workforce Development (TDLWD) Fiscal and Program Monitoring Plan to add the following:

- Change Q3. Page 68
   Has a veteran seeking any services been made aware of their entitlement to priority of service, and were they provided priority of service to adult program services?
- Change Parameters to Q.3, page 68
  Please check the priority status of veterans seeking services (referencing the Military Services form and DD214 as the attachment).
- Military Service form attachment added, Page 108.

Your attention in this matter is greatly appreciated. For additional information or comment, please contact me or Rubka Tamerat at (615) 741-6786.

Sincerely,

Ivan L. Greenfield, Director of Grants & Budgets

Division of Workforce Services

ILG:RT:RK

# TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT

# **MONITORING GUIDE**

# October 2015

# Prepared by: TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT Nashville, TN



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#### **GENERAL INFORMATION**

#### **Preface**

This monitoring guide has been developed to be a reference for statewide WIA programs and American Job Centers (AJC) monitoring activities. The information in this manual is intended as a guide and does not limit the reviewers in number, scope, or format.

This monitoring procedure contains the required Policy 2013-007 elements which include: federal and state program descriptions of total subrecipient contract populations; subrecipient contracts to be monitored; risk assessment and assignments; two-third's (2/3) and 1/3 requirements for monitoring WIA contracts; personnel information regarding monitoring staff; a summary of findings; the monitoring cycle and the grants monitoring process.

In addition this guide also includes: EEO information; waivers approved for WIA programs; the monitoring process and the program requirements for the Senior Community Service Program (SCSEP -- the senior program).

#### INTRODUCTION

The Workforce Investment Act places primary emphasis on program performance at state and local area levels. Monitoring at state and local area levels will ensure that proper systems are in place, being followed, and meet the requirements of the law. To accomplish these things, the state has prepared this monitoring guide, which includes onsite and desktop monitoring systems, corrective action, follow-up procedures and other items.

The reason for emphasizing monitoring is to assist in reducing the possibility of audit exceptions, sanctions, and unallowable costs (which may need to be reimbursed to the federal government). Through the use of established monitoring procedures, both state and local areas may minimize such problems by early detection and correction.

For sixteen consecutive years, the Division of Workforce Services, Department of Labor and Workforce Development, has been relying on Program Accountability and Review (PAR) to conduct subrecipient monitoring reviews of WIA contractors. All contractors will be reviewed at least once each year.

Purpose: Monitoring can serve many purposes. Although it is most common to monitor for compliance with federal and grant requirements, monitoring should be viewed as a multifaceted management activity directed at achieving program goals and financial requirement standards. Monitoring then becomes a program identification tool that links planning, program design, implementation, technical assistance, and evaluation and financial requirement standards. The purpose of this review guide is to examine compliance with WIA programs under the Tennessee Department of Labor and Workforce Development. These programs are provided at American Job Center Comprehensive Centers statewide in accordance with each program's policy regarding agreements, board membership, appointment procedures and areas of representation, responsibilities, and activities. The department holds the position that funds, which are distributed to the states from federal-funding agencies (for services and contractors), should be monitored annually. An exception to annual monitoring pertains to National Emergency Grant contracts which are to be monitored twice each year.

According to the requirements stated in 20CFR Section 667.410 (b) (2) of the USDOL each Governor is responsible for the development of the state monitoring system that demonstrate the plan meets the requirement stated above. In addition, WIA §184 (A) 4 also requires each Governor of a state receiving WIA Title I funds "to conduct on an annual basis onsite monitoring of each local area within the state to ensure compliance with the uniform administrative requirements" (20 CFR §667.400 (c)(2) including the applicable cost principles).

To conduct a thorough review, PAR monitors will examine both fiscal and programmatic aspects at Administrative Offices and/or American Job Center Comprehensive Centers/Local Workforce Investment Areas (LWIAs). This updated guide (to be used by PAR) along with Uniform Administrative Review instruments should be used to review program delivery and also expenditures and invoices, which are connected to contracts and activities.

Prior to the monitoring reviews, PAR should receive a copy of the contracts from the fiscal division. As far as locations of the monitoring reviews, a fiscal review and a programmatic review can be conducted at the Administrative Offices. However, a programmatic review would be incomplete without the monitors observing "first-hand" the delivery of participant services that occur in this process at American Job Center Comprehensive Centers.

The opportunity, to deliver employment and training services in an American Job Center Comprehensive Center, depends on a proposed provider's designation or certification as an Eligible Service Provider (*WIA §121*). Eligible providers are identified not only according to performance but also by means of the state working in collaboration with Local Workforce Investment Boards. (Specific performance indicators are discussed separately in this monitoring guide.)

#### **Grant Monitoring Process**

**Notification Process:** The Program Accountability Review team will provide written notice, to each entity being monitored, at least ten days prior to a review's being conducted. The written notice will inform the entity of: the dates for the review; which programs will be reviewed; the contract numbers of contracts that will be examined; and, the estimated time of arrival.

If the date(s) identified in the written notification is not convenient for the entity being monitored, the entity must contact the monitors immediately. The entity and the monitors will determine a mutually-satisfactory date, and the review will be rescheduled. However, state monitors reserve the right to conduct monitoring or unscheduled reviews as appropriate.

**Monitoring Process**: The Tennessee Department of Labor and Workforce Development (TDLWD) PAR monitors will use this monitoring guide to conduct fiscal system activities and program reviews. The guide will be amended as regulatory changes occur.

• The monitor review may be conducted through desktop evaluation, onsite evaluation or through a combination of these two processes.

- PAR monitors are authorized to monitor any entity receiving Workforce Investment Act (WIA) and Workforce Development funds at the American Job Center Comprehensive Centers. Their review may include: examining program records; questioning employees; interviewing participants; and entering any site or premise which receives WIA funds.
- Random sampling techniques will be used to perform the review of program records.
   Monitors will hold an exit conference with appropriate officials for each review conducted.
- After the monitors finish their examination, working papers shall be established during the review and maintained by the TDLWD.

#### **Time Schedules**

Monitor Report A monitoring report is issued within fifteen (15) working days of the

completion of the monitor working papers.

**Corrective Action** A corrective action plan will be issued within thirty (30) calendar days of

the publishing of the monitoring report that requires corrective action.

Progress Report A progress report will be issued to TDLWD each month until the

corrective action has been accomplished.

#### **REQUIRED MONITORING PLAN**

Grants awarded by Workforce Services consist of, at present, cost-reimbursement contracts awarded in most cases to local **government and county** administrative units. As provided in WIA 1998, LWIAs are permitted to submit optional modifications to their local plans during the period covered by their plan (*WIA §112(d)*).

Additional emphasis is placed on quality service and continuous improvement in performance outcomes. The aggregate effort of the providers, in the American Job Center Comprehensive Centers, determines that area's annual performance, and the combined efforts of all partners will be reflected in the statewide performance.

This outline should be used to gather information concerning the programs PAR has been asked to monitor during fiscal year 2014-2015. By using the questions in this guide, during staff and management interviews (about each program), PAR should be able to receive consistent information from all grantors about all programs. The grantor can answer these

questions and submit the information to PAR; also, PAR staff may use this document as a guide when conducting information-gathering meetings with grantors.

# **Program Contact Information:**

Ivan Greenfield, Director of Grants & Budgets Unit Rubka Tamerat, Grants & Budgets Unit Phone (615) 741-1031

# **Fiscal Contact Information:**

Ivan Greenfield, Director of Grants & Budgets Unit Mia Cook, Grants & Budgets Unit Phone (615) 741-1031

#### **Contract Office**

Kathy McCain, Manager, Fiscal
Bill Haynes, Acct. Tech II, Fiscal
Phone: 615-532-1338 (McCain)
615-741-5353 (Haynes)

#### **Contact for PAR Staff**

Paul Stewart, Director Program Accountability Review Unit (615) 532-9866 Paul.Stewart@tn.gov

# **MONITORING/CORRECTIVE ACTION PLAN PROCESS**

- 1. Grants and Budget Unit (GBU) staff update the department's monitoring guide based on OACS guidelines and policy 2013-007 requirements which include lists of contracts, a risk assessment chart, and fiscal and program questionnaires for all WIA programs.
- 2. The Director for the GBU forwards the updated monitoring guide with a letter to General Services by October 1 of each year. Negotiations will take place until the Monitoring Guide is formally approved.
- Once the monitoring guide has been approved by General Services, a copy is provided to the Communications Office to be placed on TDLWD's Web site and a copy is provided to PAR.
- 4. Budget and Grants staff receive a notice from PAR 30 days prior to a monitoring visit. Budget and Grants staff enter the projected date of the review on a monitoring-tracking, shared spreadsheet.
- 5. PAR forwards the results of the monitoring review to the Assistant Administrator of Workforce Services.
- 6. If there is no finding and no corrective action is needed, Budget and Grants staff enter the date on which the monitoring report was issued, the date on which the monitoring report was received, and the expression "no findings reported" on the spreadsheet.
- 7. If there is a finding, the Corrective Action Plan (CAP) must be sent within 30 days. If the CAP is not accepted, a notice will be sent to the LWIA for technical assistance if needed.
- 8. If the CAP does not arrive within 30 days or the CAP is not accepted, a notice will be sent to the LWIA or technical assistance will be provided by Workforce Services staff.
- 9. After 30 days, the CAP will be sent to the Budget and Grants Director for approval.

# Policy 2013-007 Requirements

# A. 2/3-1/3 REQUIREMENTS FOR MONITORING WIA

Please find the calculations for the 2/3-1/3 **requirements and the number** of contracts and amount of contracts to be monitored **on Page 11** 

#### B. PERSONNEL INFORMATION REGARDING MONITORING STAFF

Please find the monitoring staff organizational chart and FTEs on Page 12

# C. FEDERAL AND STATE PROGRAM DESCRIPTIONS

Please find the federal and state program descriptions on Page 12

# D. SUBRECIPIENT CONTRACT POPULATION

Please find the total subrecipient contract populations on Page 43

#### E. SUBRECIPIENT CONTRACTS TO BE MONITORED

Please see Attachment A

#### F. MONITORING CYCLE

The WIA Monitoring Cycle is based on the state Fiscal Year (October  $1^{st}$  – September  $30^{th}$ )

#### G. RISK ASSESSMENT AND ASSIGNMENTS

Please see Attachment C

# H. SUMMARY OF FINDINGS

Please see Attachment D

#### I. GRANTS MONITORING PROCESS

Please see Attachment E SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

# 2/3-1/3 Requirement for Monitoring the WIA

In accordance with 20 **CFR** Section 667.410 (b) (2) of the USDOL, each Governor is responsible for the development **of a state** monitoring system **which demonstrates that** the plan meets the requirement stated above. In addition, WIA §184 (a) 4 of requires each Governor of a state receiving WIA Title I funds "to conduct on an annual basis onsite monitoring of each local area within the state to ensure compliance with the uniform administrative requirements" (20 CFR §667.400 (c)(2)).

The contracts listed in **Attachments A & B in** this manual will provide information to General Services and the public as to the Tennessee Department of Labor and Workforce Development contracts issued and monitored throughout the year. Modifications to contracts are included in Attachment B.

#### Monitoring Cycle: October 1, 2014 -- September 30, 2015

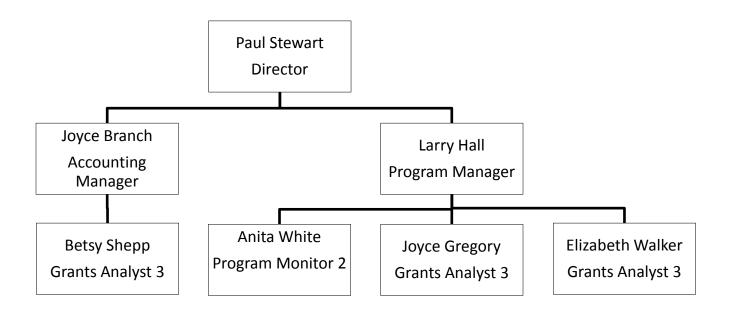
Please see below the calculations for the 2/3-1/3 requirements of the minimum number of contracts and the amounts of the contracts to monitored.

	Amount	Number
Attachment A	\$119,830,351,	277
Attachment B	\$Grand Total	0
Total Amount	\$119,830,351	281

2/3 of the number of contracts to be monitored 184 1/3 amounts of funds to be monitored \$39,994,510

The Department of Labor and Workforce Development has historically monitored 2/3 of the contracts issued and 1/3 of the total amount of contracts allocated. Doing so fulfills the requirements under Policy 2013-007.

#### PROGRAM ACCOUNTABILITY REVIEW ORGANIZATION CHART



TDLWD has seven (7) Full Time Equivalent (FTE) staff who are responsible for monitoring all WIA Programs. All staff monitor formula, NEG, Incentive contracts and all other WIA contracts issued.

#### **PROGRAM DESCRIPTIONS**

WIA Section 117 (4) requires the local board in partnership, with the chief elected, to conduct oversight with respect to local programs of: youth activities authorized under section 129; **local** employment and training activities authorized under Section 134; and, the one stop delivery system in the local area. The new federal legislation demanded that states build a more streamlined and more flexible workforce development system that meets the needs of its customers and avoids the duplication of services.

To this end, WIA 1998 requires that a physical location in each Local Workforce Investment Area (LWIA) be established which provides universal access to a specific array of Core and Intensive services delivered by American Job Center Comprehensive Centers (WIA §121 (e)).

# Program monitoring reviews may include but are not limited to:

- Reporting accuracy
- Record keeping and file maintenance
- Self monitoring functions
- Service delivery
- Automated systems and reporting
- Human resources
- Policies and procedures

#### **Program Universal Labor Exchange Service**

This WIA menu of services applies to participants described in the WIA program and labor exchange programs. State merit-staff employees, along with other service providers at the career centers, provide core services and applicable intensive services. These services are provided to job seekers including adults, older youth, and dislocated workers, and also employers. Other service recipients of labor exchange programs include: Unemployment Insurance (UI) claimants, veterans, migrant and seasonal farm workers, older workers, SNAP program recipients, and individuals with disabilities (20 CFR Sub-Part C 652.207 et seq.; (42 U.S.C. 4701 et seq.; Addendum 1, OMB A-133 Compliance Supplement June 30, 2009, pp. 4-17.258 thru – 10.).

#### **WIA Program Services**

**Core Services**, with no eligibility requirements, consist of:

- a. Eligibility determinations
- b. Job Search and placement assistance, including career counseling
- c. Labor market information which identifies job vacancies, skills needed for demand occupations, and local, regional, and national employment trends
- d. Initial assessment of skills and needs
- e. Information regarding LWIA performance outcomes
- f. Assistance in establishing eligibility for welfare-to-work activities
- g. Information about and referral to available supportive services
- h. Follow-up services to help individuals keep their jobs once they are placed (WIA §134(d)(B)(2))

#### **Intensive Services** consist of:

a. Comprehensive assessments

- b. Development of Individual Employment Plans
- c. Group and individual counseling
- d. Case Management
- e. Short-term, prevocational services (WIA §134 (d)(B)(3))

# **Training Services consist of:**

- a. Development of Individual Training Accounts (ITAs)
- b. Occupational skills training
- c. On-the-job training
- d. Entrepreneurial training
- e. Skill upgrading
- f. Job readiness training
- g. Adult education and literacy (WIA §134 (d)(B)(4))
- h. Incumbent Worker Training

Supportive Services, when not available from other sources, consist of:

- a. Transportation
- b. Childcare
- c. Needs-related payments necessary for participation in WIA
- d. Relocation assistance (WIA §101 (46))

#### **WIA Funding**

WIA authorizes three funding streams for the WIA Title I programs -- Adult, Youth, and Dislocated Workers. In Program Year 2014, Ninety-one (91) percent of the adult and youth funds and (71) percent of the dislocated worker funds are allocated to the LWIAs. Of the remaining youth, adult, and dislocated worker funds, five (5) percent is used by states to administer the programs. In addition, twenty-five (20) percent of the dislocated worker funds is used for Rapid Response and the remaining 3.75 percent from each of the 3 programs is used for statewide activities.

Of the total adult and youth funds received, the state distributes 91 percent of the adult and youth funds by formula to the LWIAs. LWIAs are allowed to use 10 percent of the 91 percent for administrative purposes, and the remaining 81 percent is used for program activities.

The state allocates 71 percent, of the total dislocated worker funds received, to the LWIAs by using factors required by USDOL and additional factors the Governor adds to the list. LWIAs may use a maximum of (10) ten percent for administration and the remaining 61 percent for dislocated worker program activities.

# Fiscal monitoring activities may include but are not limited to:

- a. Budget methodologies
- b. Cash management practices
- c. Cost allocation plans and processes
- d. Cash disbursement compliance and documentation
- e. Program income identification and reporting
- f. Internal controls
- g. Purchasing and procurement processes and procedures
- h. Property accountability and safeguarding

#### **Grants for Adults Must Serve...**

All adults, 18 and over, are eligible to receive WIA services. In the event adult program funds, allocated to an area are limited, priority will be given to recipients of public assistance and to other low-income individuals. The services to be provided are: 1) Core services; 2) Intensive services; 3) Training or Retraining services.

The question "who is eligible for training" is determined by the following conditions:

- The funding availability in the area
- The individual employment plan developed for the customer after receiving core services and intensive services
- The criteria developed by the LWIA to target the most-in-need for retraining services

Note: Limited funding in an LWIA is defined as a **75%** expenditure rate before the end of the third quarter of that program year; at which time, the most in need or economically disadvantaged will be given priority for WIA services (*E&T Memo 00-11*).

#### **Grants for Dislocated Workers Must Serve...**

WIA § 101 (9) defines dislocated workers in the following manner.

A. They are individuals who: have been terminated or laid off, or who have received a notice of termination or layoff from employment; are eligible for or have exhausted their entitlements to unemployment compensation; have been employed for a duration sufficient to demonstrate attachment to the workforce but are not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that was not covered under the

state unemployment compensation law; are unlikely to return to a previous industry or occupation.

- B. They are individuals who have been terminated or laid off, or have received a notice of termination or layoff from employment as a result of any permanent closure of, or any substantial layoff at a plant, facility, or enterprise. They are also individuals who are employed at a facility where the employer has made a general announcement that such facility will close within 180 days; or, for purposes of eligibility, they are individuals who are receiving services other than training services described in section 134(d)(4), intensive services described in section 134(d)(3), or supportive services. They are also individuals who may be employed at a facility where the employer has made a general announcement that the facility will close.
- C. They are individuals who were self-employed (including employment as a farmer, a rancher, or fisherman) but are unemployed as a result of general economic conditions in the community in which the individual resides or are unemployed because of natural disaster.
- D. They are individuals who are displaced homemakers

#### **Grants for Youth Are Required to Serve...**

# **Eligible Youth**

An eligible individual must meet the following criteria:

Youth age 14-21

Economically disadvantaged (Up to five (5) percent of the funds allocated to a local workforce area may be used for youth that do not meet the income criterion.)

Youth must meet at least one of the following criteria:

- Deficient in basic literacy skills
- School Dropout
- Homeless, a runaway, or a foster child
- Pregnant or a parent
- Offender
- Requires additional assistance to complete an education program or to secure employment (as defined in the LWIA's plan).

#### Out-of School Youth

- An out-of-school youth is an eligible youth
- Youth age 14-21
- Economically disadvantaged (Up to 5 percent of the funds allocated to a local workforce area may be used for youth that do not meet the income criterion.)

# And is one of the following:

- A school dropout, or
- A high school graduate or holder of a GED but is one of the following:
  - Basic skills deficient
  - Unemployed, or
  - Under-employed.

NOTE: Priority of services to veterans is paramount and is to be observed in all employment and training activities. At each point of entry or program services, the LWIA must ensure that veterans are aware of their entitlement to priority of services and that the full array of services is available to them.

#### **Discretionary/State & National Reserve**

An LWIA may request additional State Reserve Funds and/or National Reserve Funds if that LWIA does not have sufficient funds to serve WIA Title I eligible customers, who have been terminated or laid off, or have received a notice of termination or have been laid off by an employer. When such a request for statewide funds is made, the Administrative Entity must submit a letter, to the Administrator of Workforce Services, documenting the need for additional funds.

The Administrative Entity, with the letter, will submit another document showing the: number to be served; the funding source (youth, adult, or dislocated worker); training to be provided; and amount of funds needed to serve the customers requesting services.

When a request for National Reserve funds is made, the state, in collaboration with the Administrative Entity in one or more local areas will submit a grant application to the United States Department of Labor (USDOL).

# **Program Service Providers**

For-profit and non-profit providers may be used to deliver services. However, each training provider (that the LWIA uses for its respective area) must be approved as an eligible training provider, as specified in Tennessee's State Plan. This plan is accessible on the department's Web site at http://www.state.tn.us/labor-wfd/empwfd.htlm. The list of eligible training providers is routinely updated and can be accessed through the same hyperlink.

#### Allowable Activities: Focus Area

It is important that a Program Accountability Review (PAR) team review the IEPs (Individual Employment Plans designed for participants) and then determine whether the plans have been implemented. PAR should expect to see e-CMATS documentation that can be used to examine and track the activities of participants. This system will allow the review of the individual plan designed for a participant. This plan will include an assessment and activities which the participant receives to address his or her needs.

#### **Policies**

Even though state policies are not specifically stated in the contracts, policies and changes made to previous policies may be found on the department's Web site. The policies issued for this program are routinely available at Workforce Development Web page <a href="http://www.state.tn.us/labor-wfd/empwfd.html">http://www.state.tn.us/labor-wfd/empwfd.html</a> after these policies are distributed via e-mail and via US mail to the LWIAs and to WIA partners and contractors. In addition, the WIA/e-CMATS policy-program Manual, the Workforce Investment Programs Technical Assistance Manual, and the State Financial Management Handbook are available to LWIAs through the Web site.

#### **Exception-Based Guides**

The current monitoring guide makes references to current policies and the *Workforce Investment Programs Technical Assistance Manual*. However, there will be policy changes and updates throughout the year. The updated materials will be e-mailed to PAR monitors and posted on the Department of Labor and Workforce Development Web site.

#### **Fiscal**

#### **Allowable Costs**

- Budget revisions need to be made whenever increases or decreases are approved.
- Close-out reports are due forty-five (45) days after the end of the contract period.
- The state will need nine working days in order to process the drawdown request/reimbursement. This means that at least nine days prior to the anticipated date, the request for drawdown is needed by the state. If contractors submit a draw request after this time, there is no guarantee of its being paid the following week. Drawdown requests, must be received by the Tennessee Department of Labor and Workforce Development on Wednesday (CST) by noon, to be available the following Friday.
- All contractors must estimate needs based upon cash outlays.
- Funds may be drawn down no more frequently than weekly.

# **Fiscal Reporting**

- A monthly Expenditure Report is due, for each contract, by the 20<sup>th</sup> of the following month.
- A Quarterly Report, reflecting accrued expenditures (by cost category, when needed, on a cumulative basis), must be submitted for each contract by the 20<sup>th</sup> of the following month, or submitted by a date determined by Fiscal Services if necessary.
- The Quarterly Report must reflect program income, if any, and rebates or refunds to any program. There is also a WIA Stand-In Costs Report that must be submitted if costs are to be considered as a substitute for disallowed costs (as the result of an audit or other review).
- A Close Out package is to be completed for each contract and is due forty-five (45) days after the end of the contract period.

#### **Non-Discrimination**

The Department of Labor and Workforce Development, State and LWIBs, American Job Center Comprehensive (One-Stop) Career Centers, service providers, vendors, and

subrecipients are committed to full compliance with the following nondiscrimination and equal opportunity laws and with implementing of the following regulations:

- Civil Rights Act of 1964
- Rehabilitation Act of 1973, Section 504
- Americans with Disabilities Act of 1990
- Title IX of the Education Amendments of 1972
- Age Discrimination Act of 1965
- Department of Justice Final Rule 2002
- WIA §188
- The regulations implementing the statutory provisions

Thus, PAR reviewers need to ensure that the subrecipient is in compliance with the listed nondiscrimination provisions, in accordance with **TCA §4-4-123** and **TCA §4-21-901 et seq.**, which is in place to ensure that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance (*United States Code*, §2000d).

#### and that:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance (*United States Code*, §1681).

#### and,

No person in the United States shall, on the ground of blindness or severely impaired vision, be denied admission in any course of study by a recipient of Federal financial assistance for any education program or activity, but nothing herein shall be construed to require any such institution to provide any special services to such person because of his blindness or visual impairment (*United States Code*, §1684).

These laws and regulations are applicable to all of the programs, activities, and operations of TDLWD and the subrecipient entities with which the department

contracts to utilize federal funds. WIA 1998 describes these requirements as follows:

NON-DISCRIMINATION, (a) In General--(1) Federal financial assistance.--For the purpose of applying the prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), on the basis of disability under section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), on the basis of sex under Title IX of the Education Amendments of 1972 (20 U.S.C. 1681 et seq.), or on the basis of race, color, or national origin under Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), programs and activities funded or otherwise financially assisted in whole or in part under this Act are considered to be programs and activities receiving Federal financial assistance. (2) Prohibition of discrimination regarding participation, benefits, and employment. No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with, any such program or activity because of race, color, religion, sex (except as otherwise permitted under Title IX of the Education Amendments of 1972), national origin, age, disability, or political affiliation or belief. Prohibition on assistance for facilities for sectarian instruction or religious worship.—Participants shall not be employed under this title to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants). (4) Prohibition on discrimination on basis of participant status.—No person may discriminate against an individual who is a participant in a program or activity that receives funds under this title, with respect to the terms and conditions affecting, or rights provided to, the individual, solely because of the status of the individual as a participant. (5) Prohibition on discrimination against certain non-citizens.—Participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylums, and parolees, and other immigrants authorized by the Attorney General to work in the United States (WIA §188).

# **Nondiscrimination Information and Reporting Requirements**

The documentation and other compliance measures, required for compliance with nondiscrimination statues and regulations, include a nondiscrimination provision indicating that the provider has explained these nondiscrimination provisions. All individuals, covered by these regulations, must sign a hardcopy acknowledging their awareness of these nondiscrimination provisions; and, the hardcopy of the signature page must be kept in the individual's file:

1. Subrecipient must provide initial and continuing notice that they do not discriminate on any prohibited ground. This notice must be provided to: (1) Registrants, applicants, and eligible applicants; (2) Participants; (3) Applicants for employment and employees; (4) Unions or professional organizations that hold collective bargaining or professional agreements with the subrecipient; (5) Subrecipients that receive WIA Title I funds from the state; (6) and, Members of the public, including those with impaired vision or hearing, (b) As provided in Sec. 37.9, the subrecipient must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others. All notices must contain the specific language indicated below.

#### **Equal Opportunity Is the Law**

It is against the law for this recipient of Federal financial assistance to discriminate the following bases against any individual in the United States: on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and against any beneficiary of programs financially assisted under Title I of WIA of 1998 on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIA Title I-financially assisted program or activity. The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access to any WIA Title I financially-assisted program or activity; providing opportunities in, or treating any person with regard to such a program or activities or making employment decisions in the administration of, or in connection with, such a program or activity (29 CFR 37.29).

2. Subrecipients that publish or broadcast program information in the news media must ensure that such publications and broadcasts state that the WIA Title I financially assisted program or activity in question is an equal opportunity

employer/program (or otherwise indicate that discrimination in the WIA Title I financially assisted program or activity is prohibited by Federal Law). This publication must also indicate that auxiliary aids and services are available upon request to individuals with disabilities (29 CFR 34.24).

3. Certain subrecipients are required to provide language assistance to individuals who do not speak English as their primary language and who have a limited ability to speak, read, write or understand English. These individuals are to be considered Limited English Proficient (LEP) and are entitled to free language assistance. Subrecipients can begin to comply with these provisions through application of the 4 Factor Test as described in policy guidance issued by the U.S. Department of Justice dated April 12, 2002.

(Federal Register: May, 2003. Department of Labor, Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons)

#### Waivers Approved 2014-2017

The purpose of the general statutory and regulatory waiver authority is to provide flexibility to states and local areas and to enhance their ability to improve the statewide workforce investment system (20 CFR §662.400).

1. Waiver of the prohibition at CFR 664.510 on the use of Individual Training Accounts for older and out-of-school youth.

The State was previously granted a waiver of the prohibition at 20 CFR 664.510 on the use of Individual Training Accounts (ITAs) for older youth and out-of-school youth program participants. The State was granted an extension of this waiver through **June 30, 2017.** Under this waiver, the State can use ITAs for older youth and out-of-school youth program participants. The State must continue to make the 10 youth program elements available as described at WIA Section 129(c)(2). The State should ensure that funds used for ITAs are tracked and that the ITAs are reflected in the individual service strategies for these. (Additional elements are pending approval from USDOL.)

2. Waiver to permit the State to replace the performance measures at WIA Section 136(b) with the common measures.

The state was granted this waiver through June 30, 2017. The State was previously granted a waiver that allows the State to replace the 17 performance measures under WIA Section 136(b) with the common measures. This waiver permits the State to negotiate and report WIA outcomes against the common performance measures only, rather than the performance measures described at WIA Section 136(b). The State will no longer negotiate and report to ETA on the following WIA measures: WIA adult and dislocated worker credential rates; participant and employer customer satisfaction; older youth measures; and younger youth measures. The State will use the three adult common performance measures to negotiate goals and report outcomes for the WIA Adult and WIA Dislocated Workers programs. The State will use the three youth common performance measures to negotiate goals and report outcomes for the WIA Youth program. Workforce Investment Act Standardized Record Data system (WIASRD) item 619, Type of Recognized Credential, should be completed for each individual as appropriate, regardless of this waiver to report on common performance measure outcomes only.

3. Waiver of WIA Section 133(b) (4) to increase the allowable transfer amount (up to 50%) between Adult and Dislocated Worker funding streams allocated to a local area.

The State is granted this waiver through **June 30, 2017**. Under the waiver, transfer authority is limited to 50 percent. This limitation provides states flexibility while ensuring consistency with Congressional intent regarding the level of funding appropriated for the WIA Adult and Dislocated Worker programs.

4. Waiver of WIA Section 123 that requires that providers of Youth program elements to be selected on a competitive basis.

The State is partially granted this waiver through **Junes 30, 2017**. Under this waiver, the State is permitted to allow its American Job Center Comprehensive (One-Stop) Career Centers or partner agencies to directly provide youth program elements of supportive services, follow-up services, and work experience. In utilizing this waiver, the State and local areas must

still meet Office of Management and Budget requirements (codified in 29 CFR 95.40-95.48 and 97.36) and all state and local procurement laws and policies.

5. Waiver of WIA Section 134(a) to permit local areas a portion of local funds (up to 10%) for incumbent worker training.

The State was granted an extension of this waiver through June 30, 2017. Under this waiver, the State is permitted to allow local areas to use up to 10 percent of local Dislocated Worker funds and up to 10 percent of local Adult funds for incumbent worker training only as part of a lay-off aversion strategy. Use of Adult funds must be restricted to serving lower-income adults under this waiver. The ETA believes limiting incumbent worker training to the specified level and requiring it to be a part of layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver is restricted to skill attainment activities. Local areas must continue to conduct the required local employment and training activities at WIA Section 134(d), and the State is required to report performance outcomes for any individual served under this waiver in the WIASRD (field 309). TEGL No. 26-09, Section 7A, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEGL No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver" provide policy guidance related to implementation of this waiver.

6. Waiver of WIA Section 134(a)(1)(A) to permit a portion of the funds reserved for rapid response activities to be used for incumbent worker training.

The State was granted an extension of this waiver through **June 30, 2017** to permit use of rapid response funds to conduct allowable statewide activities as defined under WIA Section 134(a)(3), specifically incumbent worker training. Under this waiver, the State is permitted to use up to 20 percent of rapid response funds for incumbent worker training only as part of a lay-off aversion strategy. ETA believes limiting incumbent worker training to layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver is restricted to skill attainment activities. The State is required to report performance outcomes for any incumbent workers served under this waiver in the WIASRD (field

309). TEGL No. 26-09, Section 7A, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEGL No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver" provide policy guidance related to implementation of this waiver.

7. Waiver of WIA Section 134(a)(2)(B)(II) and 20 CFR 665.200(D) to exempt the state from the requirement to conduct evaluations.

The State was granted this waiver through June 30, 2013. However, an extension request has been submitted through June 30, 2017. At the time of the submission of this guide, the State was still waiting for a response from USDOL. This grants a waiver of the requirement to conduct evaluations of workforce investment activities for adults, dislocated workers, and youth in order to establish and promote continuous improvement of the statewide workforce investment system.

8. Waiver of WIA Section 134(a)(2)(B)(111) and 20 CFR 665.200(e) to exempt the state from the requirement to provide local workforce investment areas incentive grants.

However, an extension request has been submitted through **June 30, 2017**. At the time of the submission of this guide, the State was still waiting for a response from USDOL. This would waive the requirement to provide local workforce investment areas incentive grants to reward regional cooperation, local coordination of activities, and exemplary performance.

#### ONE-STOP CAREER SYSTEM AND PARTNERS/American Job Center/Career Centers

Purpose: The American Job Center or One-Stop Career System centers and consortia partners administer and deliver employment services to adults, youth, and dislocated workers in order to improve access to WIA Title I program components and also to increase long-term employment opportunities for individuals. The required federal partners in the consortia include, among others, Veterans Workforce programs, Wagner-Peyser programs, Adult Education and Literacy, Rehabilitation Act of 1973 programs, the Social Security Act, and the Trade Act of 1974 programs. (An exhaustive list of required partners can be found at *WIA §121* (b)(1)(B)(i-xii)). It is allowable for additional entities to be named in the MOU, or included in competitive grant announcements, in order to administer and deliver TANF programs, National and Community Service Act programs, and more (WIA §121 (b)(2)(B)(i-v)).

# WIA MEMORANDA OF UNDERSTANDING (MOU)

Section 662.310 of the federal WIA regulations provides that local areas may develop a single umbrella MOU covering all partners and the Local Workforce Investment Board (LWIB), or separate MOUs between partners and the LWIB. Due to the rapid expansion of the Tennessee Career Center System, the department opted to institute the single umbrella approach.

It was envisioned that this process would assist both the Grant Authority and the Local Workforce Investment Board by: (1) allowing a partnering agency's Duration of Term to extend until the parties mutually agree to modify the agreement; (2) streamlining the signatory process; (3) and, providing a simpler, yet more comprehensive, composite of the Local Career Center System by delineating each partnering agency's contribution by each individual county Career Center facility.

#### Statutory requirements for the instrument are:

- 1. The services to be provided through the one-stop delivery system
- 2. The manner in which costs of such services and the operating costs of the system will be funded
- The duration of the MOU
- 4. The procedures for amending the memorandum during the term of the memorandum
- 5. The methods for referral of individuals between the one-stop operator and the one-stop partners, for the appropriate services and activities
- 6. Other provisions, consistent with the requirements of this Title, as the parties to the agreement determined to be appropriate

#### The MOU contains the following elements:

- 1. MOU Boilerplate: Each partnering agency is listed under "Parties to this agreement"
- 2. Partner's MOU: Each party to the agreement must have an individual component consisting of the following elements:
  - Cover Sheet identifying the partnering agency by name, address, and contact person
  - Special Terms and Conditions Page allowed by the agency's contractual regulations to include a page labeled "Special Terms and Conditions"
- 3. Letter of Confirmation indicating which required partners are not included due to the services not being available in the LWIA

- 4. Signatory Sheet signed by the Local Workforce Investment Board Chairperson, the Local Chief Elected Official(s) Chairperson, and the signature authority of all partnering agencies
- 5. Executive Summary containing:
  - A rollup of all partner programs or services provided, how the services will be provided, methods of referral, and personnel positions by title, part-time or full-time (if part-time, scheduled hours/days) by individual county facility
  - The Local Career Center System total budget rollup showing the source, amount of the funds and allocation method(s), and indirect costs by each partnering agency by county facility
  - The Local Career Center System total budget rollup depicting the partner agency's total contribution

#### PERFORMANCE OUTCOME MEASURES

The WIA specifies core indicators of performance for workforce investment activities in adult, dislocated worker, and youth programs. The nine (9) Common Measures apply to the adult, dislocated worker, and youth programs. PAR will not verify outcome data; it will only verify the process to gather the outcomes to be reviewed.

The outcomes are supported by the contracts in that the State Plan. Each local workforce area plan includes information regarding goals for each performance measure and how services will be provided to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met.

# State of Tennessee WIA Regression Performance Levels PY 2014 Common Measures

Performance Metric	State
	Regression
	Levels PY 2014
Adult Measures	
Entered Employment	85%
Employment Retention	91.0%
Average Earnings	\$15,711
Dislocated Worker	
Entered Employment	90.80%
Employment Retention	92.7%
Average Earnings	\$16,900
Youth Measures	
Placement	86.0%
Attainment	83.0%
Literacy/Numeracy	68%

#### **GRIEVANCE PROCEDURES**

Under WIA, Section 181, "Requirements and Restrictions," the general rule for grievance is that each State and local area receiving an allotment under WIA shall establish and maintain a procedure for grievances or complaints showing whether there have been violations of WIA requirements from participants and other interested or affected parties. Such procedures shall include an opportunity for a hearing; these must be completed within 60 days after the filing of the grievance or complaint. If a decision relating to the violation has not been reached in 60 days, additional procedures may include an investigation and final determination relating to the appeals of the allegation. Other issues relative to grievance procedures, such as remedies and rules of construction, are also covered in Section 181 as well as CFR 667.600.

WIA Section 181 "Requirements and Restrictions," 20 CFR 667.600; 29 CFR part 37, WIA Final Rule 661.410(a)(5) and 661.430(a)(1)(iii)

#### FEDERAL PROGRAMS

# **Adult Program**

The purpose of the Adult Program is to provide core, intensive, and training services to adults who need employment, education, training, or support services under WIA Title I programs.

#### **Adult Program Eligibility**

The following is a description of eligible adults under WIA. Individuals must meet the following criteria (*E&T Policy Memo 00-10*):

Ages 18+

#### **Adult Eligibility Documentation**

PAR should ensure that eligibility is verified. The WIA Title I program is delivered statewide through the Career Center system which provides universal access to participants who are adults, youth, dislocated workers, and employers. The allowable use of funds is determined by the eligibility criteria for each specific program or funding stream, and the individual's needs. The following is a list of basic adult-program eligibility requirements:

- 1. Social Security Number
- 2. Proof of Citizenship or Permanent Residency Card
- 3. Work Permit Issued by Immigration and Naturalization Service
- 4. Receipt of Nondiscrimination Documents, with Signature of Participant
- 5. When funds for adult programs are limited (75% expended by 3<sup>rd</sup> Quarter), disadvantaged adults will become a priority for services after veterans. Seeking proof of income or qualifying disability is an eligibility requirement (*E&T Memo 03-25*).

# **Adult Program Outcomes and Reporting**

The state plan, as well as each LWIA plan, includes information regarding goals for each performance measure and how services will be provided to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met. Please see the attached *Table for State Performance Indicators and Goals*; for reporting parameters, please see the associated *Table for Data Capture and Reporting*.

Three required performance measures apply to adult programs for reporting outcomes:

- 1. Entry into unsubsidized employment
- 2. Retention in unsubsidized employment nine months after entry into employment
- 3. Average Earnings received in unsubsidized employment nine months after entry into employment (20 CFR 666.100(a)(1); E&T Memo 01-14; WIA Memo WD 02-23, Change 3)

#### **Dislocated Worker Program**

This program provides core, intensive, and training services through the One-Stop Career Center System for the two workforce program clients: job seekers and employers. The WIA goal of universal access is achieved, from among other strategies, through close integration of services provided by Wagner-Peyser, WIA Adult and Dislocated Worker partners, and other partners in the One-Stop Career Center.

# **Dislocated Worker Program Eligibility**

The following is a description of eligible dislocated workers under WIA. An individual must meet the following criteria (*E&T Policy Memo 00-10*):

- 1. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment.
- 2. Is eligible for or has exhausted entitlement to unemployment compensation; or
- 3. Has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center referred to in WIA section 134(c), attachment to the workforce but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that was not covered under a state unemployment compensation law; and,
- 4. Is unlikely to return to a previous industry or occupation
- 5. Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise.
- 6. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or
- 7. For purposes of eligibility, to receive services other than training services described in WIA section 134 (d)(4), intensive services described in WIA section 134 (d)(3), or supportive services, is employed at a facility at which the employer has made a general announcement that the facility will close.
- 8. Was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters; or
- 9. Is a displaced homemaker. The term "displaced homemaker" means an individual who has been providing unpaid services to family members in the home and who: (A) has been dependent on the income of another family member but is no longer supported by that income; and (B) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment (Workforce Investment Act Technical Assistance Manual WIA §101 (9) (A-D) WIA §101 (10) (A-B)).

# **Asset Building Project**

In Program year 2014, the Tennessee Department of Labor and Workforce Development in partnership with local investment areas is making WIA funds available for Asset Building. The funds will be provided to businesses in local areas that have: innovative models addressing employee certifications; targeted skills upgrades; internship models; apprenticeships; business/education partnership recruitment and community outreach strategies.

Employers have a short window to apply for these grants and to provide short term training for their workers. Activities under this grant will end January 2015. This project will be supported with statewide funds. The Department of Labor and Workforce Development will evaluate each grant recipient's program results and provide information to LWIAs. The outcome of these grants will be used to replicate the best practices learned across the state. This will ensure that future results for skills upgrades will yield positive results and help workers keep up with the latest technologies and opportunities for growth. Under this grant, employers may assist incumbent workers, interns and other trainees. Each Local Investment Area, approved for this grant, will be provided with 5% administrative funds to ensure that employers are providing skill-upgrade services to their and new employees as specified in each grant agreement. This grant does not require LWIAs to match these funds with LWIA formula funds.

#### **Youth Program**

The purpose of the WIA youth program is to improve the delivery of services to young people by assisting them with the transition, expectations, and skills needed for success in the workplace. The law calls for close links to local labor market needs and community youth programs and services; it also calls for strong connections between occupational and academic learning. Youth programs include activities that promote youth development and citizenship. Some of these activities are: leadership development through community service opportunities; adult mentoring and follow-up; and targeted opportunities for youth living in high poverty areas.

#### **Youth Program Elements**

Ten program elements are required by law to be available to all eligible youth participating in WIA (**WIA §129 (c)(2**)). These elements are:

- 1. Tutoring, study skills training, and instruction leading to completion of secondary school (including dropout prevention strategies)
- 2. Alternative secondary school services

- 3. Summer employment opportunities linked to academic and occupational learning. Note: There is no separate summer program on allocation. Summer employment opportunities are to be one component in a year-round design. The summer employment opportunity must not be a stand-alone program separate from the year-round youth program, and it must include follow-up service for a minimum of 12 months.
- 4. Paid/Unpaid work experiences. Note: Work experience may be in the public or private sector and must be connected with the student's academic and career goals.
- 5. Occupational skills training integrated with career goals
- 6. Supportive services
- 7. Leadership development opportunities
- 8. Adult mentoring for not less than 12 months. Note: Mentoring can be during and after program participation.
- 9. Follow-up services for no less than 12 months. Note: Follow-up services are after program participation and are required elements for all youth enrolled in WIA.
- 10. Comprehensive guidance and counseling

Each LWIA is responsible for identifying providers through a competitive bid process. Providers included Kindergarten through 12, post-secondary, technology schools, community-based organizations, faith-based organizations, and human resource agencies.

#### **Youth Program Eligibility**

The following is a description of eligible youth under WIA. Individuals must meet the following criteria (20 CFR Subpart B 664.200):

- 1. Ages 14 21
- 2. Economically disadvantaged (up to 5% of the funds allocated to an LWIA may be used for youth that do not meet the income criteria)

And one of the following (20 CFR Subpart B 664.220):

- 1. Deficient in basic literacy skills
- 2. School dropout
- 3. Homeless, runaway, or a foster child
- 4. Pregnant or a parent
- 5. Offender

6. Require additional assistance to complete an education program or to secure employment (as defined in the LWIA plan)

### **Youth Eligibility Documentation**

Eligibility is determined in a number of ways such as: a transfer of school records, income documentation, a birth certificate, or the participant's statements. PAR should expect to see whether or not eligibility has been verified. However, due to the volume of youth participants, it is recommended that a 10% sample of files or 25 participant records (whichever is smaller) should be examined.

### **Additional Youth Eligibility Criteria**

WIA does require that, **for** all eligible youth served, 30% of the funding be used to serve out-of-school youth. Out-of-School youth are defined as (**20 CFR Subpart C 664.300-320**):

- 1. Ages 18 21
- 2. Economically disadvantage (up to 5% of the funds allocated to an LWIA may be used for youth that do not meet the income criteria)

And one of the following:

- 1. School dropout
- 2. High school graduate
- Holder of a GED, but is one of the following:
   Basic skills deficient
   Unemployed or underemployed

#### **Allowable Youth Activities: Focus Areas**

Each LWIA is required to establish a Youth Council that works with or can be a subcommittee of the local board which serves as an advisory board to the full Workforce Board (*WIA §117* (h)). Youth Council responsibilities include:

- 1. Developing parts of the local plan relating to eligible youth, as determined by the chairperson of the LWIB
- 2. Recommending eligible service providers to be awarded grants on a competitive basis and to carry out youth activities under WIA, subject to approval of the LWIB
- 3. Conduct oversight with respect to eligible providers of youth services in the local

area

- 4. Coordinate youth activities that:
  - Provide eligible youth with assistance in achieving academic and employment success, effective and comprehensive activities, which includes options for improving educational and skill competencies, and effective connections with employers
  - Ensure ongoing mentoring opportunities with adults
  - Provide opportunities for training
  - Provide incentives for recognition and achievement
  - Provide opportunities related to leadership development, decisionmaking, citizenship, and community service
  - Are deemed appropriate by the chairperson of the LWIB

#### **Youth Council Membership**

The role of the youth council is to guide and advise the local board in issues related to youth and to take equal responsibility to identify eligible providers of youth activities in the local area. Find below questions that will assist in identifying the role of the Local Youth and the importance of their role in shaping the future of the youth.

- 1. LWIB Members Are they members of the local board with special interest or expertise in youth policy? This includes LWIB members, both public and private, with special interest or expertise in youth policy (if present on the board).
- 2. Youth Service Agencies working for juvenile justice working for a local law enforcement agency
- 3. Public Housing Authorities Are they local housing authorities?
- 4. Parents of Eligible Youth Are they parents of eligible youth seeking assistance under this subtitle?
- 5. Former Customers/Representatives Do such individuals include former participants and representatives of organizations that have experience relating to youth activities?
- 6. Job Corps Are they Job Corps representatives (if appropriate)?
- 7. Other Partners/Representatives Are they members including other representatives such as the chairperson of the LWIB, in cooperation with the chief local elected official, who determines this to be appropriate?

#### **Youth Program Outcomes and Reporting**

Three required performance measures (common measures) apply to youth programs, for

reporting outcomes, funded by WIA 1998. These are:

Youth (Age 19 - 21) (20 CFR 666.100 (a)(3)(ii))

- Attainment of a Degree or Certificate
- Placement in Employment or Education
- Literacy and Numeracy Gains

(20 CFR 666.100(a)(1) Common Measures Waiver, Letter to Governor Haslam, 02/13/2008; E&T Memo 01-14; WIA Memo WD 02-23, Change 3)

#### **National Emergency Grants**

The purpose of the National Emergency Grant is to provide supplemental dislocated worker funds to LWIAs and other eligible entities which allow them to respond effectively to workers and communities affected by major economic dislocations and affected by other dislocation events which cannot be met with formula allotments.

The services to be provided in the Dislocated Worker and National Emergency Grant programs, as initially shown in the introduction to this review guide, include: the eligibility referred to under National Emergency Grant below.

National Emergency Grants are provided through WIA in order to deliver the following employment and training activities:

- 1. To provide employment and training assistance to workers affected by major economic dislocations, such as plant closures, mass layoffs, or closures and realignments of military installations.
- 2. To provide assistance to the Governor of Tennessee within the boundaries of which is an area that has suffered an emergency or a major disaster as defined in paragraphs (1) and (2), respectively, of section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5122 (1) and (2).
- 3. To provide disaster relief employment in the area; and, to provide additional assistance to a state or local board for eligible dislocated workers in a case in which the state or local board has expended the funds provided under this section to carry out activities described in paragraphs (1) and (2) and can demonstrate the need for additional funds to provide appropriate services for such workers, in accordance with requirements prescribed by the Department of Labor (WIA §173 (a)(1-3)).

### **Eligibility National Emergency Grants**

The eligibility criteria for employment and training assistance, under National Emergency Grants, requires that an individual be any of the following:

- A dislocated worker
- 2. A civilian employee of the Department of Defense or the Department of Energy employed at a military installation that is being closed or that will undergo realignment, within the next 24 months after the date of the determination of eligibility
- 3. Is a long-term unemployed individual, or is temporarily or permanently laid off as a consequence of a disaster (Note: long-term unemployed is defined by the state in the Terms and Conditions of the specific NEG contract.)
- 4. An individual who is employed in a non-managerial position with a Department of Defense contractor, who is determined by the Secretary of Defense to be atrisk of termination from employment as a result of reductions in defense expenditures, and whose employer is converting operations from defense to non-defense applications in order to prevent worker layoffs; or
- 5. A member of the Armed Forces who -- (I) was on active duty or full-time National Guard duty; (II) is involuntarily separated (as defined in section 1141 of title 10, United States Code) from active duty or full-time National Guard duty; or is separated from active duty or full-time National Guard duty pursuant to a special separation benefits program under section 1174a of title 10, United States Code, or the voluntary separation incentive program under section 1175 of that title;
- 6. Is not entitled to retired or retained pay incident to the separation; and applies for such employment and training assistance before the end of the 180-day period beginning on the date of that separation (WIA §173 (c)(2)(A)(i-iv), WIA §173 (d)(2)).

### **Dislocated Worker and NEG Eligibility Documentation**

PAR should ensure that eligibility is verified. The WIA Title I program is delivered statewide through the American Job Center (One-Stop) Career Center system which provides universal access to participants who are adults, youth, dislocated workers, and employers. The allowable use of funds is determined by the eligibility criteria for each specific program or funding stream and **is** determined by the individual's needs. Dislocated Workers who need WIA services must provide:

1. A Social Security Number

- 2. Proof of Citizenship or Permanent Residency Card
- 3. A Work Permit Issued by Immigration and Naturalization Service
- 4. Self-employment documents such as tax forms
- 5. Divorce papers for displaced homemakers
- 6. Proof of UI benefits or qualification for UI benefits
- 7. Layoff papers showing loss of employment
- 8. A Receipt of Nondiscrimination Documents, with the Signature of Participant
- 9. When funds for adult programs are limited (75% expended by 3<sup>rd</sup> Quarter), proof of income or qualifying disability is an eligibility requirement. If an NEG has been issued, this criterion has already been met (*E&T Memo 03-25*).

Please note that the records needed to comply with requirements 1 through 3 (shown above) may vary. However, documentation of 1 through 3 shown above, at a minimum, may consist of one item from List A, <u>or</u> one each of the items from List B and List C of Exhibit 11 as noted in the WIA/e-CMATS Program Manual, Workforce Investment Program, Technical Assistance Manual.

#### **Additional Eligibility State Guidelines for Dislocated Workers**

The following are additional factors that distinguish dislocated workers from other populations served by the WIA program (with the exceptions of those who are displaced homemakers and self-employed). For this purpose a dislocated worker is one who is:

- A civilian employee of the Department of Defense or the Department of Energy employed at a military installation that is being closed, or that will undergo realignment, within the 24 months after the date of the determination of eligibility
- A long-term unemployed individual, or is temporarily or permanently laid off as a consequence of a disaster. (Note: long-term unemployed is defined by the state in the Terms and Conditions of the specific NEG contract.)
- An individual who is employed in a non-managerial position with a Department of Defense contractor, who is determined by the Secretary of Defense to be atrisk of termination from employment as a result of reductions in defense expenditures, and whose employer is converting operations from defense to non-defense applications in order to prevent worker layoffs; or
- A member of the Armed Forces who -- (I) was on active duty or full-time National Guard duty; (II) is involuntarily separated (as defined in section 1141 of title 10, United States Code) from active duty or full-time National Guard duty; or, is separated from active duty or full-time National Guard duty pursuant to a special

- separation benefits program under section 1174a of title 10, United States Code, or the voluntary separation incentive program under section 1175 of that title;
- Not entitled to retired or retained pay incident to the separation; and applies for such employment and training assistance before the end of the 180-day period beginning on the date of that separation (WIA §173 (c)(2)(A)(i-iv),(d)(2)).

### **Dislocated Worker and NEG Eligibility Documentation**

PAR should ensure that eligibility is verified. The WIA Title I program is delivered statewide through the One-Stop Career Center system which provides universal access to participants who are adults, youth, dislocated workers, and employers. The allowable use of funds is determined by the eligibility criteria for each specific program or funding stream and is determined by the individual's needs. Dislocated Workers who need WIA services must provide:

- 1. A Social Security Number
- 2. Proof of Citizenship or Permanent Residency Card
- 3. A Work Permit Issued by Immigration and Naturalization Service
- 4. Self-employment documents such as tax forms
- 5. Divorce papers for displaced homemakers
- 6. Proof of UI benefits or qualification for UI benefits
- 7. Layoff papers showing loss of employment
- 8. A Receipt of Nondiscrimination Documents, with the Signature of Participant
- 9. When funds for adult programs are limited (75% expended by 3<sup>rd</sup> Quarter), proof of income or qualifying disability is an eligibility requirement. If an NEG has been issued, this criterion has already been met (*E&T Memo 03-25*).

Please note that the records needed to comply with requirements 1 through 3 (shown above) may vary. However, documentation of 1 through 3 shown above, at a minimum, may consist of one item from List A, or one each of the items from List B and List C of Exhibit 11 (WIA/e-CMATS Program Manual, Workforce Investment Program, Technical Assistance Manual).

### **Additional State Guidelines when Servicing Dislocated Workers**

Please note the factors below that prevent individuals from being served as dislocated workers.

- 1. Individuals who are unable to work for any reason, and such condition can be documented, are not considered eligible
- 2. Individuals who are terminated or laid-off for cause are not eligible for dislocated services
- 3. Individuals are not eligible if the closing or layoff constitutes a strike or lockout
- 4. Individuals who voluntarily terminate (quit) their employment are not eligible for dislocated services as a result of that dislocation
- 5. The situation outlined in the last two circumstances above would not prevent an applicant from receiving dislocated worker services if that individual is awarded UI benefits as a result of mitigating circumstances surrounding the termination for cause or voluntary termination.
- 6. Applicants who are laid off with recall rights should not be excluded from dislocated worker services based solely on the recall factor -- This situation will apply primarily to organized labor with employment contracts.
- 7. Applicants shall not be considered eligible for dislocated worker services if the applicant has been dislocated for five or more calendar years from the date of attempted certification
- 8. An applicant's termination must be permanent in nature.

\*In addition to the service provider guidelines introduced earlier in this review guide, it is IMPORTANT for PAR to note that, in the National Emergency Grant program, approved service providers may not be listed in the preliminary list of approved providers as published by Workforce Development.

# **Statewide Programs**

Statewide programs are various programs the state directly contracts with entities delivering services that are not usually delivered by Local Workforce Investment Areas.

#### **Statewide Programs-Eligibility Criteria**

Eligibility for these programs is the same as in other WIA programs or funding streams (Adults, Dislocated Worker, and Youth). However, the skill shortage grants-eligibility criteria are different since

these services are geared toward skill-specific training.

#### Statewide Programs: Focus Areas, Policies, and Test Sampling

Additional information and questions regarding each specific statewide grant or activity may be

found in the state contract. WIA federal regulations do not specify what percentage or how many of the

participant files should be reviewed. If the standard review which PAR conducts is 20%, this should be adequate.

#### **Incentive Grants**

These grants are provided to states in recognition of performance that exceeds negotiated levels. The purpose of the incentive grant is to carry out one or more innovative programs under WIA Title I, WIA Title II, or the Carl D. Perkins Vocational and Technical Education Act. Local incentive grant funds may be used for any of these activities and other activities with the written approval of the Department of Labor and Workforce Development. Not all incentive funds are spent on participants; yet, if an LWIA's plan for incentive funds reflects participant services, then the incentive contract needs to be reviewed using the same guidelines as regular adult, dislocated worker, and/or youth program contracts (*WIA § 503 (a) 20 CFR 666.410*).

To receive an Incentive Grant, the qualified LWIA must provide a short summary describing the circumstances for requesting funds. This should include: the amount of available funds in the particular funding source; the total cost of training and the cost per participant; the previous occupations of the customers, and the new training field customers are seeking; an analysis of the needs survey if there is a request from the result of plant closure or mass layoff; the reasons for not using other funding sources to pay for the training costs (Pell Grants etc.); and, evidence of coordinated efforts with other partners to meet the other needs of the customers requesting training services. The decision for approval or denial of state funding will be made within seven working days of the receipt of this application. If the state denies the request for funding, the state will forward the LWIA a National Reserve Grant application. (See WIA Policy E&T Memo 01-13.)

The Workforce Investment Act allows states the option of providing incentive awards for LWIAs meeting or exceeding performance goals. During the first two years, there were no incentive awards. However, a new state policy (*E&T Memo 02-23 Change 3*) approved by the State Workforce Development Board on October 2, 2006, authorizes incentives and sanctions. (See Workforce Development Web site.) For state fiscal-year 2011-2012, incentive grants have been awarded in Tennessee, and thus, they must be monitored on a yearly basis.

# SUBRECIPIENT CONTRACTS POPULATION

Area	Administrative Entity & WIA Contact					
LWIA	Kathy Pierce, Executive Director					
1	Alliance for Business and Training, Inc.					
	P.O. Box 249					
	386, Highway 91 North					
	Elizabethton, TN 37644					
	Office: 423-547-7515 ext. 126					
	FAX: 423-547-7522					
	Cell: 423-895-1105					
	Email: <u>kpierce@ab-t.org</u>					
	And glyons@ab-t.org					
	Counties Served: Carter, Johnson, Sullivan, Unicoi, & Washington					
LWIA	Dr. Nancy Benziger Brown, Ph.D. FAICP					
2	Dean of Workforce Development					
	Walters State Community College					
	500 South Davy Crockett Parkway					
	Morristown, TN 37813-9989					
	Office: 423-318-2709					
	FAX: 423-585-6769					
	Email: <u>nancy.brown@ws.edu</u>					
	Or <u>brownnb@aol.com</u>					
	Counties Served: Claiborne, Cocke, Grainger, Greene, Hamblen, Hancock,					
	Hawkins, Jefferson, Sevier, & Union					
LWIA	Donna W. Stansberry, Director of WIA Services					
2	6057 W- Andrew Johnson Hwy., Suite 6A					
_	Talbott, TN 37877					
	Office: 423-317-1062					
	FAX: 423-317-1061					
	Email: <u>Donna.Stansberry@ws.edu</u>					

Area	Administrative Entity & WIA Contact
LWIA	Barbara Kelly, Executive Director
3	Knoxville-Knox County CAC
	P.O. Box 51650
	2247 Western Avenue
	Knoxville, TN 37950-1650
	Office: 865-546-3500
	FAX: 865-546-0832
	Email: <u>barbara.kelly@knoxcac.org</u>
	Counties Served: Knox
LWIA	Vaughn Smith WIA Director
3	Knoxville-Knox County CAC
3	P.O. Box 51650
	2247 Western Avenue
	Knoxville, TN 37950-1650
	Office: 865-544-5200 etc 1214
	FAX: 865-544-5269
	Email: <u>vaughn.smith@knoxcac.org</u>
	Counties Served: Knox
LWIA	Gary Holiway, Executive Director
4	East Tennessee Human Resource Agency
7	9111 Cross Park Drive
	Suite D-100
	Knoxville, TN 37923
	Office: 865-691-2551 ext 4202
	Cell: 865-705-8469
	FAX: 865-531-7216
	Email: <u>gholiway@ethra.org</u>
	Anderson, Blount, Campbell, Cumberland, Loudon,
	Monroe, Morgan, Roane, and Scott
LWIA	Chris Tiller, WIA Director
4	728-E Emory Valley Road
	Oak Ridge, TN 37830
	865-813-0281/865-590-1052 ext 7102
	FAX: 865-813-0288
	Cell: 865-705-8650
	Email: <u>ctiller@ethra.org</u>

Area	Administrative Entity & WIA Contact
LWIA	Beth Jones, Executive Director
5	Southeast Tennessee Development District
	1000 Riverfront Parkway
	Chattanooga, TN 37405-0757
	Office: 423-266-5781
	FAX: 423-267-7705
	Email: <u>bjones@sedev.org</u>
	Bledsoe, Bradley, Hamilton, Marion, McMinn, Meigs,
	Polk, Rhea, and Sequatchie
LWIA	Rick Layne, WIA Director
5	Southeast Tennessee Development District
	TN Career Center – Chattanooga
	Eastgate Towne Center
	5600 Brainerd Rd. Suite A-5
	Chattanooga, TN 37411
	Office: 423-424-4212
	FAX: 423-643-2396
	Cell: 423-413-8742
	Email: <u>rlayne@sedev.org</u>
	another contact: Anna Smith <u>AnnaS@sedev.org</u>
	Can Managa F. and I' a B'andar
LWIA	Gary Morgan, Executive Director
6	Workforce Solutions
	410 Wilson Ave
	P.O. Box 1628
	Tullahoma, TN 37388
	Office: 931-455-9596
	FAX: 931-455-9580
	TDD: 931-454-0477
	Email: gmorgan@workforcesolutionstn.org
	Counties Served: Bedford, Coffee, Franklin, Grundy, Lincoln, Moore, & Warren

Area	Administrative Entity & WIA Contact
LWIA	Luke Collins, Executive Director
7	Upper Cumberland Human Resource
	Agency
	580 South Jefferson Suite B
	Cookeville, TN 38501
	Office: 931-528-1127
	Direct Office Line: 931-520-9600
	FAX: 931-526-8305
	Cell: 931-397-2025
	Email: <u>lcollins@uchra.com</u>
	Cannon, Clay, DeKalb, Fentress, Jackson, Macon,
	Overton, Pickett, Putnam, Smith, Van Buren, and
	White
LWIA	Linda Shuiten, WIA Director
7	Local Workforce Investment Area 7
,	Upper Cumberland Human Resource
	Agency
	580 South Jefferson Avenue, Suite B
	Cookeville, TN 38501
	Phone: (931) 520-9610 (Direct Line)
	Office: 931-528-1127
	FAX: 931-526-8305
	TTY: 1-800-848-0298
	Email: <u>llschuiten@uchra.com</u>
	Marla Rye, Executive Director
LWIA	Workforce Essentials
8	523 Madison St. Suite A
	Clarksville, TN 37040
	Office: 931-551-9110
	FAX: 931-551-9026
	Email: mrye@workforceessentials.com
	Counties Served: Cheatham, Dickson, Houston, Humphreys, Montgomery,
	Robertson, Stewart, Sumner, & Williamson

Area	Administrative Entity & WIA Contact
LWIA 9	Paul Haynes, Executive Director The Nashville Career Advancement Center 621 Mainstream Drive, Suite 210 Nashville, TN 37228-1201 Office: 615-862-8890 ext. 77407 FAX: 615-862-8910 TDD: 1-800-848-0298 Email: paul.haynes@nashville.gov www-NCACWorkforce.org  Counties Served: Davidson, Rutherford, Trousdale, & Wilson
LWIA10	Jan O. McKeel, Executive Director South Central Tennessee Workforce Alliance #8 Public Square, 2nd Floor Columbia, TN 38401 Office: 931-375-4201 FAX: 931-381-7643 Email: Jan.McKeel@sctworkforce.org  Counties Served: Giles, Hickman, Lawrence, Lewis, Marshall, Maury, Perry & Wayne
LWIA 11	Mike Smith, Executive Director Southwest Human Resource Agency P. O. Box 264 1527 White Avenue Henderson, TN 38340-0264 Office: 731-989-5111 Cell: 731-608-1539 FAX: 731-989-3095 Email: msmith@swhra.org  Counties Served: Chester, Decatur, Hardeman, Hardin, Haywood, Henderson,

Area	Administrative Entity & WIA Contact						
Area 11	Jimmy Bell, WIA Director						
	Southwest Human Resource Agency						
	1527 White Avenue						
	Henderson, TN 38340						
	Office: 731-989-0533						
	Cell: 731-435-0728						
	FAX: 731-983-3149						
	Email: <u>jbell@swhra.org</u>						
LWIA 12	Dr. Karen Bowyer, President						
LVVIA 12	Dyersburg State Community College						
	1510 Lake Road						
	Dyersburg, TN 38024						
	Office: 731-286-3301						
	Fax: 731-286-3269						
	Email: <u>kbowyer@dscc.edu</u>						
	Linaii. Kbowyei @dscc.edd						
	Counties Served: Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake,						
	Lauderdale, Obion, Tipton & Weakley						
LWIA 12	Margaret Prater, Executive Director						
	Northwest TN Workforce Board						
	313 West Cedar Street						
	Dyersburg, TN 38024						
	Office: 731-286-3585 ext. 16						
	Fax: 731-286-3584						
	TDD: 731-286-3584						
	Email: <u>prater@nwtnworks.org</u>						
	www-dscc.edu						
	Counties Served: Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake,						
	Lauderdale, Obion, Tipton & Weakley						
	,						

Area	Administrative Entity & WIA Contact
LWIA 13	Melanie Winfield, Interim Director
	Memphis Work force Investment Network
	LWIA 13
	480 Beale Street
	Memphis, TN 38103
	Office: 901-576-6812
	FAX: 901-576-6844
	Cell: 901-341-3083
	P-cell: 901-497-9404
	Email: melanie.winfield@Workforceinvestmentwork.com
	www.workforceinvestmentnetwork.com
	Counties Served: Fayette & Shelby
	Melanie Winfield, Deputy Director, Operations
	Memphis Work force Investment Network
	LWIA 13
	480 Beale Street
	Memphis, TN 38103
	Office: 901-576-6813
	FAX: 901-576-6844
	Cell: 901-341-3083
	P-cell: 901-497-9404
	Email: melanie.winfield@workforceinvestmentnetwork.com
	<u>www.workforceinvestmentnetwork.com</u>

# **Tennessee Department of Labor & Workforce Development**

220 French Landing Drive Nashville, TN 37243-0658 Contact: Dustin Swayne Title: Deputy Commissioner

Phone: 615-532-5945 Fax: 615-741-3003

Workforce Help Line 1-800-255-5872 Email: <u>Sterling.VanDerSpuy@tn.gov</u>

Website: <a href="http://www.state.tn.us/laborwfd/index.html">http://www.state.tn.us/laborwfd/index.html</a>

# **Tennessee AFL-CIO**

Technical Assistance Program 1901 Lindell Avenue Nashville, TN 37203 (615) 383-6899

**Adult Education** 220 French Landing Drive, 4<sup>th</sup> Floor Nashville, TN 37243-0658 (615) 741-7058

### **QUESTIONNAIRE**

#### **RATINGS**

<u>YES</u> = This question has been verified and agency has supporting documentation.

NO = This question has been verified, but agency has identify existing gaps. The agency will take steps to address internally, and/or will request technical assistance/instruction from state or applicable contact.

N/A = This question does not pertain to my agency/department/organization.

# FISCAL QUESTIONNAIRE

Subrecipient:		
Reviewer:	Date of Review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

# WORKFORCE INVESTMENT MONITORING TOOL FISCAL QUESTIONNAIRE

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Have all of the LWIA's programs, which exceed \$500,000 in WIA funding, been audited during the past two years?				Please refer to the audit report and the corrective action if any are on file with the administrative office.
2.	If so, have all audit reports been sent to grantor agencies?				Please cross-reference the LWIA administrative office and grantor agency for verification
3.	Does the LWIA annually authorize all bank accounts and check signatories?				Please verify with current bank documentation of authorization and check signatories at LWIA and compare to TDLWD fiscal office
4.	Does the LWIA have a line item budget for the adult, dislocated worker, and youth program?				Please review the budget for each program.
5.	Does the agency have a method to ensure that the obligation on all contracts does not exceed availability?				Please check the procedure or any method the LWIA uses to prevent over-obligation of contracts.
6.	Were the expenditures on contracts (WIA contracts) over reported?				Please check all invoices and reconciled reports submitted to TDOL during the monitoring period.
7.	How often does the LWIA draw down cash and how does it determine the amount to be drawn?				Please check the cash management activities and the needs for the amounts to be drawn.
8.	Does the LWIA have a policy on cash management and does it follow any such policies on cash management?				Please check to see if its policy is followed as instructed?
9.	If the LWIA has purchased				Please see the approval and the

	equipment costing \$100-\$5,000, did the LWIA request approval? Approval for equipment over \$5,000?		request submitted to TDLWD? (For equipment both less than \$5,000 and more than \$5,000)
10.	Does the LWIA account for any program income earned? Were all program incomes reported if any?		Please learn whether or not the LWIA has earned program income and reported it to TDLWD during the proper reporting quarter?
11.	Does the LWIA have excess cash on hand?		Please compare the amount of drawdown each month with expenditures to see if all draws are expended before making additional drawdown requests (for each contract drawdown requested)?
12.	Did the LWIA use its earned program income for program service(s)?		Please check what the program income was used for.
13.	How does the LWIA allocate funds to staff working in various grants? How is time of staff allocated and documented for these various programs?		Please check with the fiscal administrator to review staff time distribution sheets and the calculations based on the documented time distribution.
14.	Is the LWIA adhering to the state travel regulations when its employees are on business travel? Are mileage logs documented and payments based business trips only?		Please check the LWIA's travel policy and how it is followed and how payments made.
15.	Are the agency's vehicles used by personnel for personal business?		Please check if payments are made for personal use and if the LWIA authorized these vehicles to be used as personal vehicles for the staff.
16.	Is new equipment tagged and inventory taken? If equipment is missing, did the LWIA report to authorities and inform TDLWD?		Please check the inventory list and see if it is updated to account for all new acquisitions. Please check to see the document submitted to local authorities and to TDLWD for missing equipment.
17.	Did the cognizant agency provide an approval letter for indirect cost rate for the WIA program?		Please request letter of approval from administrative staff.

18.	Are time sheets maintained for any employees who work on more than one program?		Please review time sheets of employees assigned to more than one program, for Labor Distribution.
19.	Are the LWIA's depreciation policies or methods of computing use allowances in accordance with the standards outlined in federal circulars or WIA regulations?		Please review LWIA depreciation policies.
20.	Does the LWIA system have procedures that provide reasonable assurances that consistent treatment is applied in the distribution of charges as direct or indirect costs to all benefiting programs?		Please review procedures regarding distribution of direct/indirect charges.
21.	Is access to personnel files limited?		Please consult administrative staff to identify employees given access to personnel files review.
22.	Has the LWIA met all liabilities for eligible costs incurred, but not paid for, during the contract period and within the period of funding availability?		Please review the contract terms and ensure that the subcontractor has shown a match for each participant in these programs.
23.	Does the LWIA have a record of the cost allocation plan approved by the cognizant agency and did the LWIA apply these costs accurately and consistently?		Please review the plan and paper work to see how the approved indirect cost is applied.
24.	Are administrative costs applied according to the plan for the particular contract number or program?		Please review administrative costs and how they are applied to each contract and determine if the costs are within the limits allowed.
25.	Are all purchases competitively bid?		Please review purchase orders and verify the existence of several suppliers.
26.	Has the LWIA sent a request to TDLWD for acquisition of equipment?		Please ask for a copy of the request form.
27.	If the LWIA has subcontracts or other cooperative agreements with service providers, do the subcontracts have cooperative		Please review subcontract agreements and ensure that the agreement contains compliance information and

	agreements to provide information, controls, and monitoring schedules to ensure compliance with these provisions?		monitoring schedule.
28.	Does management provide personnel approving and preauditing expenditures with a list of allowable and unallowable expenditures?		Please review allowable and unallowable list management provided to personnel.
29.	Is there separate accountability for charges and costs between federal and nonfederal activities?		Please review the accountability for cost and charges to federal and nonfederal activities.
30.	Are adjustments to unallowable costs made where appropriate and follow-up action taken to determine the cause?		Please check to see if there are unallowable costs and if they have been corrected, and also followed up to avoid future occurrences.
31.	Have internal and external communication channels, on activities and costs allowed, been established?		Please refer to each contract agreement regarding activities and allowed costs.
32.	Have formal or informal training programs been established to provide the knowledge and skills necessary to determine activities and costs allowed?		Please refer to training manuals, developed or training held, for new subcontractors at the local level.
33.	Is there interaction between management and staff regarding questionable costs?		Please refer to communications between management and staff regarding questionable costs, if any.
34.	Are grant agreements (including referenced program laws, regulations, handbooks, etc.) and cost principle circulars available to staff responsible for determining activities allowed and allowable costs under federal awards?		Please see if the fiscal staff at the LWIA has the WIA Financial Supplementary Handbook or the One Stop Guide for reference and the WIA law and regulations.
35.	Does management review supporting documentation of allowable cost information?		Consult with management team or responsible party for reviewing allowable costs.
36.	Are comparisons with the budget and expectations of allowable costs made?		Please check the procedure used to compare budget and allowable costs.
37.	Are analytical reviews and audits performed?		Please review audit report.

38.	Is the accounting system capable of scheduling payments for accounts payable and requests for funds from treasury to avoid time lapse between drawdowns and actual disbursements of funds?		Please check the procedure used to avoid time lapse between drawdowns and actual disbursement of funds.
39.	Is there variance reporting of expected versus actual cash disbursements of federal awards and drawdowns of federal funds?		Please check if there are variances between <b>cash</b> disbursement and drawdown of federal funds.
40.	Are there periodic independent evaluations (e.g., by internal audit, top management) of entity cash management, budget and actual results, repayment of excess interest earnings, and federal drawdown activities?		Check if evaluation has been made regarding cash management, budget and actual results, repayment of excess interest earnings, and federal drawdown activities.
41.	Are contractor and subcontractor payrolls monitored to ensure certified payrolls are submitted?		Please review the agreements and contract terms between contractor and subcontractor.
42.	Are management reviews performed to ensure that contractors and subcontractors are properly notified of the Davis-Bacon Act (for incumbent worker or for on-the-job training) services?		Please review the Davis-Bacon Act requirements.
43.	Are periodic audits of detailed transactions conducted?		Please check the audit report.
44.	Are accurate records maintained on all acquisitions and dispositions of property acquired with federal awards?		Please see if records kept on all acquired property are up-to-date and that a copy has been sent to TDLWD.
45.	Are property tags placed on equipment?		Please to see if all property acquired with federal funds is tagged.
46.	Is a physical inventory of equipment periodically taken and compared to property records?		Please see if the inventory listing of all equipment is up-to-date.
47.	Have procedures been established to ensure that the federal awarding agency is appropriately reimbursed for dispositions of property acquired with federal awards?		Please review the procedure developed to ensure appropriate reimbursement for acquired property.

48.	Are policies and procedures in place for responsibilities of record			Please review the policy for record keeping or interview
	keeping and authorities for			fiscal management staff
49.	disposition?  Does the accounting system			responsible for this duty.  Please interview the fiscal
	prevent obligations or			management staff about how
	expenditures of federal funds			they prevent expenditures from
	outside of the period of	 		occurring outside the contract
	availability?			period.
50.	Are channels of communication			Please interview the
	established for people to report	 		management about how
	suspected improprieties in the use			suspected improprieties in the
	or disposition of equipment?			use or disposition of equipment
				are prevented.
51.	Does management review the			Please review the listing of
	results of periodic inventories and			inventory that the management
	follow-up on inventory			reviewed before forwarding a
	discrepancies?			list to TDLWD.
52.	Does management review			Please review management's
	property dispositions to ensure			property valuation and reimbursement.
	appropriate valuation and reimbursement to the federal			reimbursement.
	awarding agency?			
53.				Please review the quarterly
33.	Does the budgetary process			financial expenditure reports
	consider the period of availability			forwarded to the awarding
	of federal funds as to both			agency.
	obligation and disbursement?			<i>o</i> ,
54.	Are the entity's operations such			Please review how fiscal
	that it is unlikely there will be			management assures that
	federal funds remaining at the			federal funds received are
	end of the period of availability?			expended before the contract is
				closed.
55.	Are un-liquidated commitments		l —	Please review the directives of
	canceled at the end of the period			management to staff regarding
FC	of availability?			un-liquidated commitments.
56.	Are un-liquidated balances			Please check to see if
	periodically reported to the appropriate level of management,			management has any decisions or directives for fiscal staff on
	with follow-up?			un-liquidated balances.
57.	Are periodic reviews of			Please review expenditure
57.	expenditures before and after cut-			goals to ensure that funds have
	off dates performed to ensure			been expended before the
	compliance with period of			ending dates of funding
	availability requirements?			availability.
58.	Does management perform			Please review expenditure

	periodic reviews of reports showing budget and actual expenditures for a specified period?		reports provided to management for decision making.
59.	Is there a clear assignment of authority for issuing purchasing orders and contracting for goods and services?		Please review duties of the fiscal staff.
60.	Does the procurement manual incorporate federal requirements?		Please review the procurement manuals of the subcontractor.
61.	Have procedures been established to identify risks arising from conflicts of interest, e.g., kickbacks, related-party transactions, bribery?		Please review the conflict of interest policy of the subgrantee and please check if staff are aware of this policy.
62.	Are conflict of interest statements maintained for individuals responsible for procurement of goods and services?		Please check with staff responsible for this duty.
63.	Is there an official written policy for suspension and debarment that:  a. Contains or references the federal requirements?		Please check the disbarment and suspension policy. If one is not available, please check to see if any written document is provided to staff regarding this provision.
	b. Prohibits the award of a sub- award, covered contract, or any other covered agreement for program administration, goods, services, or any other program purpose with any suspended and debarred party?		Please check the disbarment and suspension policy. If one is not available, please check to see if any written document is provided to staff regarding this provision.
	c. Requires staff to determine that entities, receiving sub-awards of any value and procurement contracts equal to or exceeding \$25,000, and their principals are not suspended or debarred for inserting a clause in the agreement?		Please check the disbarment and suspension policy. If one is not available, please check to see if any written document is provided to staff regarding this provision.
64.	Is the contractor's performance, with the terms, conditions, and specifications of the contract, monitored and documented?		Please check to see if all contract terms and agreements are honored by the contractor.
65.	Are duties properly segregated		Please review the duties of

	between employees responsible			employees in accounts payable
	for contracting and accounts			and cash disbursement.
	payable and cash disbursing?			Diagon was installed a management
66.	Do supervisors review			Please review the procurement
	procurement and contracting			procedures, or policy, or manual the contract uses.
	decisions for compliance with			manual the contract uses.
67	federal procurement policies?			Black of the second of
67.	Are procedures established to			Please review the procedure
	verify that vendors providing			the contract uses to verify
	goods and services under the			vendor's status.
	award have not been suspended			
	or debarred from federal			
	procurement contracts?			
68.	Are procurement actions			Please check file and the
	appropriately documented in the			documents to assure activities
	procurement form TDLWD			regarding procurements are
60	established?			documented.
69.	Has a system been established to			Please review the procurement
	assure that procurement			procedures and verify if the
	documentation is retained for the			rules for procuring goods and
	time period required by the A-102			services are followed.
	Common Rule, OMB Circular A-			
	110, award agreements,			
	contracts, and program			
70	regulations?			BI
70.	Does management periodically			Please interview management
	conduct independent reviews of			and find out if there are
	procurements and contracting			documents showing
	activities to determine whether			independent reviews of the
	policies and procedures are being			financial system to ensure
74	followed as intended?			policies, etc. are followed.
71.	Are mechanisms in place to			Please review the quarterly
	ensure that program income is		l —	financial reports submitted to
	properly recorded as earned and			the grantor.
	deposited in the bank as			
72	collected?			Please interview the
72.	Does management compare			
	program income with the budget			involvement of management in
	and investigate significant differences?			this process.
73.				Please interview the
/3.	Does management perform an internal audit of program income?			
	internal addit of program income?			involvement of management in this process.
74.	Is there a tracking system which			Please check if there is a
/4.	reminds staff when reports are			tracking system alerting staff of
	due?		🖳	due reports.
	uuc:		<u> </u>	uue repuits.

75.	Is the general ledger or other reliable records the basis for reports?		Please review the documents used for reporting.
76.	Do supervisors review reports to assure the accuracy and completeness of data and information included in the reports?		Please check to see if reports were provided to management or supervisors for their review.
77.	Is the required accounting method used to prepare the reports (e.g., cash or accrual)?		Please review the accounting method.
78.	Is there an established accounting or information system that provides for reliable processing of financial and performance information for federal awards?		Please review the financial system's capability to process financial information for reporting purposes.
79.	Do communications from contractors corroborate information included in the reports for federal awards?		Please review contract terms.
80.	Is there a periodic comparison of reports with supporting records?		Please check if financial reports have supporting documents.
81.	Do subrecipients demonstrate that:  a. They are willing and able to comply with the requirements of the award?		Please check if the sub- recipient is complying with the requirements of the contracts awarded
	b. They have accounting systems, including the use of applicable cost principles, and internal control systems adequate to administer the award?		Same as above
82.	Do official written policies exist establishing: a. Communication of federal award requirements to subrecipients?		Please review the local policy established that covers the areas mentioned in questions 82 a,b,c, and d.
	b. Responsibilities for monitoring subrecipients?		Same as above
	c. Processes and procedures for monitoring?		Same as above
	d. A methodology for resolving subrecipient findings of subrecipient noncompliance or weaknesses in internal control?		Same as above

	e. Requirements for and processing of subrecipient audits, including appropriate adjustment of pass-through entity's accounts?		Same as above
83.	Is the subrecipients' compliance with audit requirements monitored by using techniques such as: a. Determining by inquiry and discussion whether the subrecipient met the threshold requiring an audit under OMB Circular A-133?		Same as above
	b. If an audit is required, assuring that the subrecipient submits the report package or the documents required by the latest OMB circulars and/or the recipient's requirements?		Same as above
	c. If a subrecipient was required to obtain an audit in accordance with OMB Circular A-133 but did not do so, following-up with the subrecipient and taking appropriate actions (withholding further funding) until the audit requirements are met?		Same as above
84.	Has management identified for subrecipients the federal award information (e.g., CFDA title and number, award name, name of federal agency, amount of award) and applicable compliance requirements?		Please review if the CFDA, title, number award amounts, etc., mentioned in question 111, are identified for contracts awarded
85.	Has management included in the agreements with subrecipients the requirement to comply with the compliance requirements applicable to the federal program including the audit requirements of OMB Circular A-133?		Please review if management has provided and circulated the OMB Circular A-133 to staff to make them aware of A-133 Administrative Requirement.

86.	Is subrecipient's compliance with federal program requirements monitored using such techniques as the following:  a. Issuing timely management decisions for audit and monitoring findings to inform the subrecipient whether the corrective action planned is acceptable.		Please review the monitoring techniques used by the subrecipient and check which of items the procedure fulfills.
	b. Maintaining a system to track and follow-up on reported deficiencies related to program funded by the recipient and ensuring that timely corrective action is taken.		Same as above
	c. Maintaining regular contacts with subrecipients and making appropriate inquiries concerning the federal program.		Same as above
	d. Reviewing subrecipient reports and following-up on areas of concern.		Same as above
	e. Monitoring subrecipient budgets.		Same as above
	f. Performing site visits to subrecipients to review financial and programmatic records and observe operations.		Same as above
	g. Offering subrecipients technical assistance when needed.		Same as above
87.	Do the standard award documents used by the nonfederal entity contain:  a. A listing of federal requirements that the subrecipient shall follow? (Items can be specifically listed in the award document, attached as an exhibit to the document, or incorporated by reference to specific criteria).		Please check to see if the contract or agreement between the recipient and federal funds grantor has all of the criteria listed under (a) (b) and (c).  Note: not all contracts will have these guidelines listed.

	b. The description and program number for each program as stated in the Catalog of Federal Domestic Assistance (CFDA)?  Note: If the program funds include pass-through funds		Same as above
	from another recipient, the pass-through program should be identified.		
	c. A statement signed by an official of the subrecipient stating that the subrecipient was informed of, understands, and agrees to comply with applicable compliance requirements?		Same as above
88.	Is a record keeping system in place to assure that documentation is retained for the time period required by the recipient?		Please check the record keeping system of the recipient of federal funds.
89.	Are procedures in place to provide channels for subrecipients to communicate concerns to the pass-through entity?		Please check the procedure used to communicate concerns to sub-recipients.
90.	Has a tracking system been established to assure timely submission of required reporting, such as: financial reports, performance reports, audit reports, on-site monitoring reviews of subrecipients, and timely resolution of audit findings?		Please check with management or staff for a tracking system.
91.	Are supervisory reviews performed to determine the adequacy of subrecipient monitoring?		Please interview management or check written reviews by management about the financial monitoring at the subcontractors level.
92.	Is a current, fully executed, WIA contract, along with all amendments, at the LWIA administrative office?		Please check if contracts are kept at the administrative office.
93.	Does the LWIA have a documented system of contract		Please review the contract terms and agreements made to

	administration which ensures that subcontractors perform within the terms of their subcontracts?		subcontractors.
94.	Are there mechanisms to ensure that no more than 5% of the youth funds serve nondisadvantaging youth?		Please review the expenditures for the youth program.
95.	Does the payroll for summer youth participants exceed payment amount?		Please review contract document.
96.	Were expenditures charged to contract prior to the contract's beginning date?		Please review beginning and end date to determine charges.
97.	Were there discrepancies in the participant's payroll enrolled in OJT/Incumbent Worker and NEG programs?		Please review terms of contract.
98.	Has the LWIA developed a policy for employee travel expense payment? If not, is the LWIA following the State travel reimbursement policy?		Please check what policy the LWIA or their employees are following?
99.	Does the rate of reimbursement for travel exceed the allowed state amount?		Please review the policy or payments made for travel expenses.
100.	Is there a method used by the LWIA to maintain personal costs for employees working in several programs?		Please check time the distribution sheet employees submit to the LWIA.
101.	Does the financial record the LWIA submitted to TDLWD agree with the accounting records of the LWIA?		Please compare the accounting records of the LWIA to the records submitted to TDLWD.
102.	Has the LWIA met or exceeded the minimum 30% expenditure requirement for out-of-school youth?		Please review the active youth contract to determine the percentage.
103.	Are employees or administrators using WIA owned vehicles for normal commute from home to work?		Please check the policy to find out if use of vehicles, from home to work, is part of a compensation plan.
104.	Does the LWIA have personal mobile phone policy when a staff member is approved to use personal phones for business?		Please read either the state policy or LWIA policy about how personal phones are used for business related calls.

	How are payments for business calls calculated?		
105.			Please check method of payment when personal mobiles are approved for making business calls.
106.	Was there excess cash on hand when examining drawdown amounts at the time of monitoring visit?		Please check drawdown amount expenses to determine excess cash on hand.

# PROGRAM QUESTIONNAIRE ADULT

Subrecipient:	
Reviewer:	Date of Review:
Executive Director Signature:	Fiscal Director Signature:
Date:	Date:

# LOCAL WORKFORCE INVESTMENT MONITORING TOOL PROGRAM QUESTIONNAIRE (ADULT)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the date of birth been verified and documented?				Please check if any of these are kept in the file: Photocopies of Drivers License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
2.	Does male, 18yrs & born after 1-01-60, have his Selective Service registration?				Please check to see if the register #/card is in the file of the participant.
3.	Has a veteran seeking any services been made aware of their entitlement to priority of services, and were they provided services to adult program services?				Please check the prior status of the individual seeking services (refrerencing) the Military Services form and DD214, as the attachment.
4.	Have the age and social security card been verified?				Please check for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
5.	Is the date of application documented?				Please check e-CMATS which contains the WIA application date Alien Resident Card.
6.	Has the participant & the case manager signed the application?				Please check for application signed by participant and case manager.
7.	Has eligibility been verified?				Please check for photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
8.	Has the Equal Employment Opportunity Statement been signed by the participant and the case manager?				Form requires signature from participant and case manager and in file of participant.

9.	Has the participant received core services?		Documentation of all core services provided Examples in TEGL 7-99.
10.	Is there documentation to show that the participant did not find work after receiving core services?		Please check documentation of all intensive services and evidence that participant was unable to obtain employment after initial core service. Please check random participant files.
11.	Has the Individual Employment Plan (IEP) been developed after core services and is training linked to a demand occupation?		The IEP requires signature from participant and case manager. Demand occupations should be provided in Local Plan.
12.	If participant has disabilities, is the LWIA considering him as a family of one?		Please check documentation showing funding amount and procedure used to determine amount.
13.	Has attendance during training been properly documented?		Please check attendance records.
14.	Are there case notes to demonstrate the progress of the participant?		Please check Case manager's notes providing evidence of participant's progress throughout services.
15.	Does the ITA meet the LWIA's requirement for time duration and cost limitation?		Please check explanation of procedure for which funding amount was determined.
16.	Does the provider of training services appear in the list of eligible training providers?		Please review Training Providers list on E&T Web site.
17.	Can the LWIA verify that the participant has not met other grant requirements before WIA funding is made available? (Pell Grant, Scholarships, etc.)		Please check verification from the educational institution, and/or copy of financial aid application, documentation of other funding sources.
18.	How is the satisfactory progress of the participant in training documented?		Please review case manager participant's case notes.
19.	documentation of grievance and complaint procedures?		Please check documentation and signature that the participant has received the grievance procedure.
20.	For files that e-CMATS indicates supplemental data, is there is an auditable record in the file?		Please check documentation of all training services, employment verification for 1st, 2 <sup>nd</sup> , and 3rd quarters after exit.
21.	Are core services and applicable intensive services made available by the Career Center system to all		Please review policy and procedure.

	of the following, without eligibility requirements and regardless of the area of residency:  All employers and job seekers?  Unemployment Insurance Claimants?  Veterans?  Migrant and seasonal farmworkers?  Individuals with disabilities?		
22.	Does the Career Center System have sufficient staff, equipment, and oversight to deliver core services and applicable intensive services through: • Self Service? • Facilitated self-service, and • Staff assisted service? (Are the necessary resources available? Back-up resources?)		Please make a visual confirmation and documented what was observed.
23.	Does the Career Center system have a documented procedure in place which ensures that staff provide UI claimants with the opportunity for core services and applicable intensive services?		Please review policy and procedure.
24.	Does the Career Center system have a documented procedure in place which ensures that staff:  Receive information about UI claimant's ability or availability of work offered to them?		Please review policy and procedure.
25.	Does the Career Center system make intensive services available by the One-Stop operator, by contracts with service providers?		Review the service provider's contracts
26.	Does the Career Center system have in place policies and procedures which ensure that One- Stop operators provide:  • Coordinated resources and supportive services?		Please review policy and procedure.
	<ul> <li>Services to assist adults and dislocated workers?</li> </ul>		 Same as above

	<ul> <li>Accurate information about the availability of supportive services in the LWIA?</li> </ul>		Same as above
	<ul> <li>Referral to activities which provide supportive services?</li> </ul>		Same as above
27.	Does the LWIA system have policies and procedures in place which demonstrate that:  • Follow–up services are included in IEPs?		Please review policy, procedure and random participant files
	<ul> <li>Proposed monetary assistance during and throughout follow-up services are included in IEPs?</li> </ul>		Same as above
	<ul> <li>Criteria used to provide support services to individuals who are employed and earning self- sufficient wages?</li> </ul>		Same as above
28.	Does the Career Center system have documentation which the One-Stop operator determines that: Participants need training services and have the skills and qualifications to successfully complete a training program?		Please review policy and procedure, i.e., core first, employment search, intensive second, employment search, and then training. (There are exceptions for IWT and Skill Shortage grants.)
29.	Does the Career Center System have documentation which demonstrates that participants are determined to be eligible through state priority system?		Please review policy and procedure.
30.	In the event of limited adult program funds in the LWIA (75% expended by end of 3rd quarter), does the Career Center system have records which show the accurate use of "public assistance" or "low income" adult eligibility per the HHS table of Lower Living Standard Income Levels?		Please review policy and procedure. LWIA must provide funding expenditure information.
31.	Does the LWIA have policies and procedures in place which ensure that a participant in a program shall not displace other employees:		Please review policy and procedure

	<ul><li>Who are on layoff from similar jobs?</li></ul>		
	<ul> <li>Whom the employer has terminated with the intention of filling the position with subsidized and/or employees?</li> </ul>		Same as above
	<ul> <li>Whose place for promotion is infringed upon?</li> </ul>		Same as above
32.	Does the LWIA have in place policies and procedures regarding wage and labor standards, and health and safety standards that comply with WIA regulations?		Please review policy and procedure.
33.	Is there a criteria developed to target those most in need of training services?		Please review policy and procedure.
34.	Does the LWIA system have documentation showing the follow-up services for a minimum of 12 months following the first day of employment, to registered participants who are placed in unsubsidized employment?		Please review policies, procedures, random participant files. Ex: Case notes.
35.	Has the LWIA keyed all WIA participants into the e-CMATS System?		Please check participants files and compare to information keyed into e-CMATS.
36.	Does the LWIA have an employee who verifies data entered into e-CMATS for accuracy?		Please interview data-entry person to verify accurate data entry.
37.	Have formal or informal training programs been established to provide the knowledge and skills necessary to determine activities and costs allowed?		Please check documentation or notes that training has been provided to program staff on allowable activities.
38.	Are there written policies to provide direction for making and documenting eligibility determinations?		Please check eligibility policy for Dislocated workers and e-CMATS.
39.	Are eligibility objectives and procedures clearly communicated to employees?		Please check to see if a memorandum was issued or another mechanism was used to communicate to employees the importance of accurate eligibility determination.

40.	Are authorized signatures, (manual or electronic) on eligibility documents periodically, reviewed?		Please check to see if the participant has signed the eligibility form and the form is reviewed for accuracy.
41.	Is access to eligibility records limited to appropriate persons?		Please check to see if the records of participants are kept in a safe place.
42.	Are manual criteria checklists or automated processes used in making eligibility determinations?		Please check to see if the eligibility process is performed manually or electronically or if both manual and electronic processes are used.
43.	Is the information used in making eligibility determinations verified for accuracy?		Please check to see if eligibility process is checked by staff other than the person who determines eligibility.
44.	Are there procedures to ensure the accuracy and completeness of data used to determine eligibility requirements?		Please check if the subcontractor has a process to check the accuracy of participants eligibility.
45.	Are program quality-control procedures performed?		Please check to see if the subcontractor has staff (fiscal and program quality control staff) designated to ensure all program requirements are accurate.
46.	Are program managers provided with applicable requirements and guidelines?		Please check to see if manuals with program guidelines are issued to train program managers including dates on which training was provided.
47.	Are conflict of interest statements maintained for individuals responsible for determining eligibility?		Please check to see if staff determining eligibility are aware of the provisions of "conflict of interest' when determining eligibility.
48.	Does the LWIA prohibit discrimination based on race, sex, or age in its employment practices?		Please check to see if EEO posters are displayed in the reception area of the LWIA office, in the career center or wherever WIA services are offered.
49.	Is the date of application captured in e-CMATS?		Please confirm the date through the e-CMATS.
50.	Are any participants enrolled as underemployed?		Please confirm through e-CMATS or the file of the participant.
	If yes, is there documentation of wages being below the self-sufficient wage estimate by LWIA?		Please see participant's file and documentation, or check indicator or case notes.
51.	Did the participants and case managers sign the Equal Employment Opportunity Statement (English/Spanish) and is this document maintained in		Please check the file of the participant and the EEO terms and participant's signatures.

	participant's files?		
52.	If participant is exited, has appropriate follow-up been documented?		Please check the case notes for follow- up.
53.	Have all grant requirements been verified?		Please review grant contract and content and actual services.
54.	Is there sufficient information recorded by Case Managers to follow progress of a participant?		Please check the info or statements made by Case Manager in e-CMATS.
55.	Have participants without activities for 90 days been exited out of e-CMATS?		Please check the exit indication/or case notes.
56.	Are there participants who are not exited out of the program after all activities closed?		Please check "begin" and "end" planned dates or case notes.

### PROGRAM QUESTIONNAIRE DISLOCATED WORKER

Subrecipient:		
Reviewer:	Date of Review:	
Executive Director Signature:	Fiscal Director Signature:	_
Date:	Date:	

## LOCAL WORKFORCE INVESTMENT MONITORING TOOL PROGRAM QUESTIONNAIRE (DISLOCATED)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the date of birth been verified and documented?				Please check if any of these are kept in the file: Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
2.	If male, 18yrs & born after 1-01-60, has he registered for Selective Service?				Please review and verify the selective service registration.
3.	Has a veteran seeking services received priority to such services under the dislocated worker WIA program?				Please check the prior status of the individual seeking services including documents such as Certificate; DD214, Report of Transfer or Discharge Paper.
4.	Have the age and social security card been verified?				Please check photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
5.	Is date of WIA Application captured in e-CMATS?				Please check see e-CMATS page which contains WIA application date.
6.	Is the date of hard copy application documented?				Please check application signed by participant and case manager.
7.	Has eligibility been verified? Dislocated a,b,c,d (documentation of): a. Terminated or laid off, received notice of pending termination, is eligible or has exhausted Unemployment Compensation, demonstrated attachment to the workforce, but not eligible for UI due to insufficient earnings or employer not being covered, or				Please check Separation Notice, UI records, Public Announcement of layoff, etc.

	b. Terminated or layoff due to permanent plant closure, facility has made announcement of closure in 180 days, or		Please check Separation Notice, UI records, Public Announcement of layoff, etc.
	c. Once self-employed but unemployed due to economic conditions or disaster, or		
	d. Displaced Homemaker.		Please check Separation notice of spouse and a marriage certificate.
8.	Did the participant and case manager sign Equal Employment Opportunity Statement (English/Spanish), and is the document maintained in the participant's files?		Please check the form requiring signature from participant and the case manager.
9.	Has the participant received core services, and are they documented?		Please check documentation of all core services provided (examples are in TEGL 7-99) and case manager notes.
10.	Is there documentation of intensive services that participants received?		Please check documentation of all core services provided (Examples in TEGL 7-99) and case manager notes.
	Is there documentation, that after a core service was provided, that the participant was unable to obtain employment?		Please check documentation of all intensive services and evidence that participant was unable to obtain employment after initial core service.
11.	Have Individual Employment Plans been developed after core services, and is training linked to a demand occupation?		The IEP requires a signature from participant and from the case manager. Demand occupations should be provided within Local Plan. Please check for these.
12.	Has Pell Grant, Wilder-Naifeh, Hope, TSAC aid been considered in assisting the students financial needs?		Please check for verification of the educational institutional, and/or copy of financial aid application.
13.	Has the subcontractor developed an IEP for his or her participants?		Please check to see if an employment development plan has been established for each participant.
14.	Has the subcontractor followed the IEP that was developed?		Please check to see if there was follow- up to ensure that the IEP was followed.
15.	If participant has disabilities, is the LWIA considering him as a family of one?		Please check for documentation showing funding amount and procedure used to determine amount.
16.	Has attendance during training been properly documented?		Please check the attendance records.
17.	Are Case Notes in e-CMATS adequate to follow participant's progress?		Please check case manager's notes providing evidence of participant's progress throughout services.

18.	Does the ITA meet the LWIA's requirement for time duration and cost limitation?		Please review Training Providers list on E&T Web site.
19.	Can the LWIA verify that the participant has not met other grant requirements before WIA funding is made available?		Please check for verification from the educational institution, and /or a copy of the financial aid application, documentation of other funding sources.
20.	How is the satisfactory progress of the participant in training documented?		Please review participant's case notes.
21.	Does the participant file contain documentation of grievance and complaint procedures?		Please check for this form that requires the signature of the participant and of the case manager.
22.	For files that e-CMATS indicates as supplemental data, is there is an auditable record in the file?		Please check for documentation of all training services, employment verification for 1 <sup>st</sup> , 2 <sup>nd</sup> and 3 <sup>rd</sup> quarters after exit.
23.	Has the LWIA developed a policy for relocation assistance and the rationale for the policy?		Please review policy and procedure.
24.	Has the LWIA provided relocation assistance to any dislocated worker? If yes, is there a record documenting that the worker is receiving or will receive 75% of his previous wage in the new location of employment?		Please review relocation assistance documentation.
25.	Has the LWIA followed state procedure for integrating WIA Title I funds and Pell Grant for dislocated workers who need classroom training activities?		Please review policy and procedure.
26.	Are authorized signatures (manual or electronic), that are on the eligibility documents, periodically reviewed?		Please check to see if the participant has signed the eligibility form.
27.	Is access to eligibility records limited to appropriate persons?		Please check to see if the records of participants are kept in a safe area.
28.	Is the information used in making eligibility determinations verified for accuracy?		Please check to see if the eligibility process is checked by staff other than the person who determines eligibility.
29.	Are channels of communication established for people to report suspected eligibility improprieties?		Please check to see for the policy or memorandum issued regarding suspected eligibility improprieties.
30.	Are program quality control procedures performed?		Does more than one member of the staff check for errors in the participant's file?

31.	Are conflict of interest statements maintained for individuals responsible for determining eligibility?		Please check to see if staff are aware of the conflict of interest.
32.	Does the LWIA prohibit discrimination based on race, sex, or age in its employment practices?		Please check to see if EEO posters are posted and if participants are made aware of EEO provisions.
33.	Is date of application captured in e- CMATS?		Please confirm if the date of application, for a participant, is captured in e-CMATS.
34.	Does the provider of training services appear in the list of eligible training providers?		Please check to see if the subcontractors is approved on the training providers list. (Check the state's Web site.)
35.	If participant is exited, has appropriate follow-up been documented?		Please check to see if grant requirements are followed and if there was a follow-up of participants during program and after exit.
36.	Are any participants enrolled as underemployed?		Please check to see if participants are documented as underemployed.
	If yes, is there documentation of wages being below self-sufficient wage est. by LWIA?		Please check the documentation used to determine the self-sufficient wage.
37.	If participant is exited, has appropriate follow-up been documented?		Please check case notes after exit.
38.	Is there sufficient information recorded by Case Managers to follow progress of a participant?		Please check the info or statements made by Case Managers in e-CMATs.
39.	Have participants, without activities for 90 days, been exited out of e-CMATS?		Please check the exit indication/or case notes.
40.	Are there participants who have not been exited out of the program after all activities closed?		Please check the "begin" and the "end" planned dates or case notes.
41.	If a dislocated worker is in OJT training, are the payments and hours of training as indicated in the contract terms?		Please check the contract terms.
42.	Does the OJT contract have assurances attached to the contract?		Please check if the OJT contracts have assurances attached to the contract being monitored.

## PROGRAM QUESTIONNAIRE (Asset WORKS PROJECT)

Subrecipient:	
Reviewer:	Date of Review:
Executive Director Signature:	Fiscal Director Signature:
Date:	Date:
LOCAL WORKFO	DRCE INVESTMENT MONITORING TOOL
PROGRAM	/ QUESTIONNAIRE (Asset Works)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Is the subcontractor for this grant in the local area for the LWIA that received these grants?				Check with program staff or the contracting office in the LWIA.
2.	Has the worker received skills upgrade training?				Please verify with the information the LWIA received from the employer.
3.	Did the subcontractor submit its monthly expenditures in a timely manner?				Review the reports submitted to the LWIA.
4.	If any, did the LWIA refer new employees for skills upgrade?				Check in the file for the participants or in CMATs or check with staff responsible for the grant.
5.					
6.					

# PROGRAM QUESTIONNAIRE (YOUTH)

Subrecipient:		
Reviewer:	Date of Review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

# LOCAL WORKFORCE INVESTMENT MONITORING TOOL PROGRAM QUESTIONNAIRE (YOUTH)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the date of birth been captured for all youth?				Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
2.	If male, 18yrs & born after 1-01-60, has he registered for Selective Service?				Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card, Selective Service Website or Selective Service card.
3.	Did LWIA verify age and social security number?				Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card.
4.	Is the date of WIA application captured in e-CMATS?				Please look for the e-CMATS page which contains WIA application date.
5.	Did participant sign and date the application?				Please look for the participant's signature and the signature of the case manager.
6.	Has eligibility been verified?				Please check to see the eligibility criteria used to verify eligibility.
7.	Did the participant and the case manager sign the Equal Employment Opportunity Statement (English/Spanish), and is it maintained in participant's file?				Please check to see if the participant and the case managers have signed the EEO form.
8.	Were core services provided for youth documented?				Please document all of all core services provided.
9.	Were intensive services provided to				Please document all of all training

	youth documented?		services and evidence that participant was unable to obtain employment after initial core service.
10.	Have Individual Service Strategies been developed after core services and is training linked to a demand occupation?		Please look for required signatures from participant and case manager for the IEP. Demand occupations should be provided within Local Plan.
11.	Has Individual Service Strategies been developed based off of an objective assessment of the academic levels, skill levels, and service needs of each participant?		Please see WIA Section 129(c)(1)(A).
12.	Are services, provided to youth, based on service needs documented, in the Individual Service Strategy, as a result of an objective assessment? Are employment goals and appropriate achievement objectives documented, taking into account the assessment?		Please see WIA Section 129(c)(1)(B).
13.	If participant has disabilities, is the LWIA considering him as a family of one?		Please check the documentation used for verifying disability.
14.	Has attendance during training been properly documented?		Please verify attendance records/case notes.
15.	Are case notes being utilized?		Please see case manager's notes providing evidence of participant's progress throughout services.
16.	Does the ITA meet the LWIA's requirement for time duration and cost limitation?		Please review policy and procedure; request explanation of procedure for which funding amount was determined.
17.	Has the youth been tested for a basic skills deficiency?		Please check to see test results.
18.	How does the LWIA define additional assistance to youth?		Please review the LWIA's definition of youth needing additional assistance
19.	How is the satisfactory progress, of the participant in training, documented?		Please review participant's case notes.
20.	Does the participant file contain documentation of grievance and complaint procedures?		Please check for this form that requires the signature of the participant and the signature of the case manager.
21.	Did funds spent on youth determined not to be economically disadvantaged constitute more than five percent (5%) of the youth		Please check to see the eligibility used to determine 5%.

	enrollees, by program year?		
22.	Were youth-service providers obtained through a competitive procurement basis?		Please check the provider list used by the subcontractor.
23.	Do out-of-school youth meet the following criteria:  A. School drop-out or		Review e-CMATS Discoverer Report and random participant files for eligibility.
	<ul><li>B. High School Graduate that is</li><li>Deficient in basic skills</li></ul>		Same as above
	• Unemployed or underemployed?		Same as above
24.	Are youth funds, amounting to 30 percent, being used to serve the out-of-school population?		Please check the allocation method used to ensure that 30% of funds are used to serve out-of-school; use the e-CMATS/Discoverer Report as an additional reference.
25.	Are all TEN required elements of the Youth Program being made available in the Local Area?		Please review the LWIA's current plan; refer to literature and documentation, provided by administrative office, detailing which required services are available in the LWIA; provide a listing of subcontractors that are providing these elements.
	A. Tutoring and study skills?		Same as above
	B. Alternative school services?		Same as above
	C. Summer Employment Opportunities?		Same as above
	D. Paid and unpaid work experiences?		Same as above
	E. Occupational skills training?		Same as above
	F. Leadership development opportunities?		Same as above
	G. Support services (locally defined)?		Same as above
	H. Adult mentoring?		Same as above
	I. Comprehensive guidance and counseling?		Same as above
	J. Follow-up?		Same as above

26.	Is the Youth Council meeting regularly?		Please check to see if a parent of a youth, also a youth is represented in the youth council.
	A. Is membership attending meetings?		Same as above
	B. Is there a quorum when contracts are approved and Request for Proposals (RFPs) issued?		Same as above
27.	If the LWIA has youth participants with ITAs (Individual Training Accounts), are the participants:  a. Age 18 and above?		Please check to see the age of youth for training approval.
	b. Dually enrolled in the adult program or the dislocated worker program?		Please check to see if the youth is enrolled in the adult program or dislocated worker program; verify that eligibility for the DW has been met.
	Does the LWIA use the statewide waiver for older youth ITA?		Please check to see if the LWIA has provided older youth skills upgrade.
28.	Does the LWIA system provide youth referrals for supportive services?		Please check to see the referral process used.
29.	Does the LWIA system provide objective assessments for youth participants and work experiences for youth such as:  • Instruction in employability skills?		Please check to see the file of youth to verify these stated activities (on the left).
	•Exposure to the aspects of industry such as team work, internship, paid and unpaid community service, or job shadowing?		Same as above
30.	Does the LWIA system provide objective assessments, for youth participants, which cover academic levels, skill levels, and service needs of each participant and which will also include a review of:  Basic skills?  Occupational skills?  Prior Work Experience?		Please see WIA Section 129(c)(1)(A).

	<ul><li>Employability?</li><li>Interest?</li><li>Aptitudes?</li><li>Supportive service needs?</li><li>Developmental needs?</li></ul>		
31.	Does the LWIA system include Youth Program components which include leadership, development opportunities, such as:  Exposure to post-secondary education opportunities?		Please check to see youth file to ensure the six activities listed on the left have been provided as stated in the Individual Development  Plan Refer to Participant Files for documentation (case notes) – review completion certificates if available (IEP)
	<ul> <li>Community and service learning projects?</li> </ul>		Same as above
	Peer-centered activities?		Same as above
	Team leadership training?		Same as above
	<ul><li>Training in decision-making?</li></ul>		Same as above
	<ul><li>Citizenship training?</li></ul>		Same as above
32.	Are there written policies to provide direction for making and documenting eligibility determinations?		Please check to see the eligibility indicator marked in e-CMATS and in the file of the participant.
33.	Are there procedures to calculate eligibility amounts that are consistent with program requirements?		Please check to see the mechanism that the subcontractor uses to calculate performance measures.
34.	Are eligibility objectives and procedures clearly communicated to employees?		Please check to see if a memorandum was issued or other mechanisms was used to communicate to employees the importance of accurate eligibility determination.
35.	Are authorized signatures (manual or electronic) on eligibility documents periodically reviewed?		Please check to see if the participant has signed the eligibility form.
36.	Is access to eligibility records limited to appropriate persons?		Please check to see if the records of participants are kept in a safe place.
37.	Does the LWIA provide work experience for youth?		Please check to see if case management's notes indicate this youth activity.
38.	Is the LWIA paying wages and benefits for youth in work experience?		Please check the hourly wage statements in the case notes or the type of activity in e-CMATs.

39.	Does the LWIA have a year round program?		Please check to see if the activity states that it is year round.
40.	Are youth provided follow-up services for 12 months after program exit?		Please check to see dates, agenda or staff time used for training regarding eligibility.
41.	Does the LWIA have a separate Summer Youth Program?		Please check the "beginning" and "ending" dates.
42.	Does the LWIA prohibit discrimination based on race, sex, or age in its employment practices?		Please check to see if posters regarding EEO are posted in the offices where participants are served and welcomed.
43.	Is date of application captured in e-CMATS?		Please check to see if the date of application to the WIA program is captured in e-CMATS.
44.	Have all grant requirements been verified?		Please check to see the process used by staff to verify that program requirements are met.
45.	Does the Youth Council meet all the criteria for a Youth Council (a youth parent or youth as a part of the council)?		Please check the Youth Council membership list.

PROGRAM QUESTIONNAIRE (INCUMBENT WORKER)

Subrecipient:		_				
Reviewer:	Date of Review:					
Executive Director Signature:	Fiscal Director Signature:					
Date:	Date:					
LOCAL WORKFORCE INVESTMENT MONITORING TOOL						

#### PROGRAM QUESTIONNAIRE (INCUMBENT WORKER)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Does local contract contain a				Please refer to contract terms.
	"Lobbying" clause?				
2.	Does local contract have a				Please refer to contract terms.
	"Nondiscrimination" clause?				
3.	Does local contract have a "Public				Please refer to contract terms.
	Accountability" clause?				
4.	Does local contract have a "Public				Please refer to contract terms.
	Notice" clause?			Ш	
5.	Does local contract have a				Please refer to contract terms.
	"Records" clause?			Ш	
6.	Has the participant been entered				Please refer to contract terms.
	into e-CMATS?				
7.	Has the approved training been				Please refer to contract terms.
	completed as stated in application?				
8.	Has the number of full time				Please refer to contract terms.
	employees to be trained been met?				
9.	Has the company met all proposed				Please refer to contract terms.
	fiscal obligations?				
10.	Were approved budget items				Please refer to contract terms.
	reimbursed upon presentation of				
	adequate documentation?				
11.	Was all training completed prior to				Please refer to contract terms.
	September 30 of the current				
- 10	program year?				
12.	Has employer signed a Layoff				Please refer to contract terms.
- 10	Aversion Attestation?				
13.					Please refer to contract terms.
	the local board to use up to 10% of				
	the adult or dislocated worker funds				
	for IWT & has it advised the state of				
	such approval? (Local formula funding only)				
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14.	Has the LWIA received final approval from the TN Department of Labor & workforce development? (Local formula funding only)		Please refer to contract terms.
15.	When using Adult funds for incumbent worker training, the LWIA is restricted to serving lower-income (being 200% of the lower Living Standard LevelsLLSIL). Is agency in compliance with this statement? (Local formula funding only)		Please refer to contract terms.
16.	Has the LWIA used the current IWT application provided by Workforce Development? (Local formula funding only)		Please refer to contract terms.
17.	Has the company provided documentation of the 50% match?		Please refer to contract terms.
18.	Has the company stayed within the \$25,000 cap?		Please refer to contract terms.
19.	Has the LWIA completed the Incumbent Worker Application Review?		Please refer to contract terms.

PROGRAM QUESTIONNAIRE (DEI)

Date of Review:	
Fiscal Director Signature:	_
Date:	
	Date of Review: Pate of Review: Fiscal Director Signature:

# LOCAL WORKFORCE INVESTMENT MONITORING TOOL PROGRAM QUESTIONNAIRE (DEI)

		1			
	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the DEI grant recipient hired a full-time Disability Resource Coordinator leading the effort of this project?				Please interview management or contact the DEI lead in the local area.
2.	Is the One Stop Center programmatically and physically communicative and conducive to the needs of a person with disability?				Please verify if the office, where services are provided, is accessible to people with disabilities.
3.	Has the One-Stop in the area been designated as an Employment Net Work?				Please interview management and verify the agreement with SSI designating the CC as an Employment Net Work.
4.	Has the DRC coordinated with other service providers and formed an Integrated Resource Team to meet the needs of a customer with a disability?				Please verify the existence of a Resource team and the minutes taken or verify with dates of meeting scheduled.
5.	Have the services for people with disabilities been coordinated with other programs to meet all of the needs of the person with a disability?				Please verify the referral system established or the mechanisms used by the career center to refer a person with a disability to other service providers.
6.	Does the contractor have policies and procedures in place to ensure that adults and youth with disabilities, especially those who are ticket ticket-to-work holders, will be assisted?				Please verify with staff or management the number of people with disabilities with tickets assisted in finding work or assisted with their special needs.
7.	Has the person with a disability been assessed to determine his/her strengths and interests?				Please review the Individual Employment Plans and records of people with disabilities to employment services.

	Does this person meet the requirements, identified by area businesses, for unsubsidized employment?		Please review the Individual Employment Plan and record of referral of people with disabilities to employment services.
8.	Is the LWIA capturing accurate and required data elements in e-CMATS for persons with disabilities receiving WIA services?		Please verify in <b>e</b> -CMATS that the career center <b>staff have</b> recorded the data elements of people with disabilities in e-CMATs.

PROGRAM QUESTIONNAIRE (STATEWIDE WIDE and Incentive Funds)

Subrecipient:		_
Reviewer:	Date of Review:	_
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

# LOCAL WORKFORCE INVESTMENT MONITORING TOOL PROGRAM QUESTIONNAIRE (STATEWIDE AND INCENTIVES)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the contractor submitted quarterly reports on a timely basis?				Please verify if the required quarterly reports for expenditures and obligations have been sent to TDLWD on a timely basis.
2.	Is the LWIA collecting statewide information on eligible individuals in the e-CMATS system?				Please verify if data for persons served by statewide funds are collected in e-CMATS.
3.	Does the targeted population reach those who are underemployed, because of their lack of certification, or expect to become employed, as a result of their participation in the program?				Please see program results or reports submitted on a monthly or quarterly basis.
4.	Has the contractor submitted quarterly reports on a timely basis?				Please verify with management and check the required dates for submission of fiscal and program dates.
5.	Is LWIA collecting statewide information on eligible individuals in the e-CMATS system?				Please review information keyed into e-CMATS .
6.	In providing participant services, has the LWIA met the eligibility requirements of the target group to be served through the incentive grant?				Please review the incentive plans of the sub-grantee and check to see if the target group is served.
7.	Are quarterly reports submitted in a timely manner?				Please verify that quarterly reports were submitted in a timely fashion.
8.	If the quarterly expenditure goals have not been met, has the contractor/LWIA provided an				Please check with the administrative to see if the state was provided with an explanation for the low expenditure.

	explanation, in writing, to the state			
	in the quarterly report?			
9.	Is the information regarding			Please check to see if the eligibility and
	participant eligibility and services			services, under statewide grants and
	being accurately keyed into e-CMATS	Ш	Ш	incentive grants, are being keyed
	in a timely manner?			accurately in e-CMATS.

PROGRAM QUESTIONNAIRE (NEG/TAA)

Subrecipient:		
Reviewer:	Date of Review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

## LOCAL WORKFORCE INVESTMENT MONITORING TOOL PROGRAM QUESTIONNAIRE (NEG/TAA)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Is the LWIA making progress integrating services provided by TAA/NAFTA?				Please review local plan, observe procedural process.
2.	What is the procedure at the local level to respond to plant closures and mass layoffs?				Please review local plan; review and document the procedural process.
3.	Is the local rapid response coordinator submitting information, about area rapid response activities, to the Employment and Training section of the TDLWD?				Please review records of rapid response activities; discuss with the rapid response coordinator if available.
4.	Are needs surveys distributed and collected before mass meetings?				Please review surveys and discuss this mass-meeting procedure with the local administrator/rapid response coordinator.
5.	Does the local, rapid response system include, in its response, these activities:  • Immediate and on-site contact with the employer, workers, and the local community?				Please discuss and review this procedural process with the local administrator/rapid response coordinator.
	<ul> <li>Provision of information and access to it?</li> </ul>				Same as above
	<ul> <li>Unemployment compensation benefits, One-Stop system services, and employment and training activities?</li> </ul>				Same as above
	<ul> <li>Guidance or financial assistance setting up a labor Management Committee?</li> </ul>				Same as above

	<ul> <li>Provision of assistance to the local board to develop a coordinated response?</li> </ul>		Same as above
6.	•		Please review policy and procedures.
	The dislocated worker		
	The civilian employee of the Department of Defense		Same as above
	<ul> <li>The long-term unemployed as a result of disaster</li> </ul>		Same as above
	The non-managerial employee     with the Department of Defense		Same as above
	The armed-forces member at risk of termination due to reduction in defense expenditures		Same as above
	The one who is not entitled to retire or to retain pay (incident to a separation)		Same as above
	The one who has applied for employment and training assistance before the end of the 180 day period?		Same as above
7.	Are these targeted populations reached:  a. The underemployed, because of its lack of certification?  b. The unemployed, but expect to become employed, as a result of their participation in the program?		Please review local report and consult with local administrator.
8.	·		Please review documentation that demonstrates integration of services; observe procedural methods used in the LWIA system.
	Re-employment plans		Same as above
	Job-search-allowance		Same as above

	applications		
	Relocation-allowance applications		Same as above
	Case Management		Same as above
	Training-waiver options.		Same as above
9.	and a device the second		Please see the TDLWD Financial Guide.
	procedures followed?		

**PROGRAM QUESTIONNAIRE (EEO)** 

Subrecipient:		
Reviewer:	Date of Review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

# LOCAL WORKFORCE INVESTMENT MONITORING TOOL PROGRAM QUESTIONNAIRE (EEO)

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the LWIA appointed its equal opportunity officer for WIA Title I services?				Please verify the name of each staff member with this responsibility and the name identified on poster. Please see a copy of letter to appointed staff.
2.	Has the LWIA provided reasonable accommodations for persons with disability? If not, see #16 (below).				Please verify this for all sites included in sample.
3.	Does the LWIA provide initial and continuing notice (using the required nondiscrimination language) that it does not discriminate on any prohibited ground?				Please look (or listen to) materials such as posters, broadcasts, RFPs, closed caption, etc.
4.	Does the LWIA publish or broadcast program information in the news media, and if so, does the LWIA indicate in the publications and broadcasts:  • That the WIA funded program or activity in question is an equal opportunity employer/program?				Please review of articles, text for PSAs, or any other form of media, i.e. newspaper articles, examples, etc.
	That auxiliary aids and services are available upon request to individuals with disabilities?				Same as above
5.	Has the LWIA applied the 4-Factor Analysis to its programs in order to determine how best to deliver				Please check for the written policy stating review of 4-Factor Analysis and conclusions.

	language assistance to individuals who are Limited English Proficient?		
6.	If the 4-Factor Analysis indicates the need for language assistance services, does the LWIA have in place one or more of the following oral interpretation services:		Please review or process that LWIA follows. Example: "I speak" cards.
	Bi-lingual staff?		
	Staff interpreters?		Same as above
	Contract interpreters? Or		Same a above
	Telephone interpreter line?		Same a above
7.	Do the LWIA's written translation procedures fall within the "Safe Harbor" provisions?		Please review text or analysis and documentation of census count.
8.	Does the LWIA have policies and procedures in place which ensure that interpreters and/or interpreter services provide interpretations as follows:  • With demonstrated proficiency and ability to interpret in both English and the other language, and the ability to identify consecutive, summary, simultaneous, or sight interpretations?		Please review policies and procedures and the listing of certified interpreters.
	<ul> <li>With knowledge of specialized terms and concepts of the program, vocabularies and phrases used by the LEP person?</li> </ul>		Same as above
9.	Does the LWIA have policies and procedures in place which ensure the following:  • Those interpreters must certify that they will deliver interpretations that are accurate and not biased?		Please review policies and procedures and the listing of certified interpreters, including payment statement.

	<ul> <li>Those interpreters shall accept payment for services only from the LWIA and never from the client?</li> </ul>		Same as above
10	After applying the 4-Factor Analysis, and if the need for translation of vital documents is reasonable and necessary, does the LWIA provide written translations of :  • Consent and complaint forms?		Please review documents and/or posters.
	<ul> <li>A list of One-Stop partners and services offered?</li> </ul>		Same as above
	Appeals documents?		Same as above
	<ul> <li>Notices requiring a response from clients?</li> </ul>		Same as above
	<ul> <li>Information on the right to file complaints of discrimination?</li> </ul>		Same as above
	<ul> <li>Information on the provision of services to individuals with disabilities?</li> </ul>		Same as above
	<ul> <li>State wage and hour and safety and health information?</li> </ul>		Same as above
	<ul> <li>Notices of free language assistance?</li> </ul>		Same as above
11	Does the LWIA have procedures and policies in place which ensure planning and development of:  • Methods of identifying LEP individuals who need language assistance?		Please review these policies and procedures.
	<ul> <li>Training for staff on the available language services and how to use them?</li> </ul>		Same as above
	<ul> <li>Easily-accessible and widely- known notices of free language assistance?</li> </ul>		Same as above
	<ul> <li>Training staff on monitoring interpreter activity?</li> </ul>		Same as above
12	Does the covered LWIA have		Please review policies and procedures, all

	policies, procedures, and auxiliary aids and services in place which ensure the reasonable and necessary delivery of program services to qualified individuals who have physical and/or mental impairments?		media, including videos, DVDs, etc
13	Does the covered LWIA have policies and procedures in place that ensure that individuals with qualifying disabilities will be referred for auxiliary aids and services?		Please review policies and procedures.
14	Does the LWIA have in place communication devices, such as TTY or TDD, or an equally effective communication system, for participants with a hearing impairment?		Please visually confirm that these devices or referral phone number are available.
15	If the LWIA has determined that the provision of accommodations would fundamentally alter the delivery of program, service, or activity, then does the LWIA have a written statement which details the reasons for reaching this conclusion?		Please check for a statement or policy regarding analysis or resources.
16	Does the LWIA have clearly visible signage, at the primary entrances of each inaccessible facility, that refers individuals, with disabilities, to information about accessible facilities?		Please visually confirm that this signage is in place.
17	Does the LWIA have the international symbol for accessibility at the primary entrances of each accessible facility?		Please visually confirm that this signage is in place.
18	Do the LWIA's published personnel policies and procedures prohibit actions defined in Section 37.11 of the implementing regulations?  These are:  Intimidation and retaliation for filing a complaint or furnishing information regarding		Please review these policies and procedures for personnel.

	administration of a WIA-assisted			
	program, service, or activity.			
19	Does the LWIA post approved			Please review the signs posted in regard
	nondiscrimination and equal			to EEO/Non-Discrimination provisions.
	opportunity complaint procedures			
	and contact information in:	Ш		
	<ul><li>Primary entrances?</li></ul>			
	<ul> <li>Internal memoranda, hard copy</li> </ul>			Same as above
	and electronic?	]	Ш	
	Handbooks or manuals?			Same as above
	<ul> <li>Made available to each</li> </ul>			Same as above
	participant and included in the			
	participant's file?			
	<ul> <li>Made available, in appropriate</li> </ul>			Same as above
	formats, to individuals with			
	visual impairments?			
20	Do the LWIA's orientations and			Review internal memorandum to staff;
	other presentations, to new			manual published regarding
	employees, participants, employers		_	nondiscrimination/EEO and other related
	and the general public, include a			provisions to train new staff Please
	discussion of the nondiscrimination			visually confirm these.
	and equal opportunity provisions			
	applicable to WIA programs?			
21	Does the LWIA system have a			Please review this complaint log.
	complaint log which is used to			
	record any complaints of			
22	discrimination?			Diagram in this day we delice
22	Does the LWIA have documentation to ensure that all OJT plans,			Please review this documentation.
	contracts, and other similar			
	agreements are non-discriminatory			
	and contain provisions regarding		Ш	
	non-discrimination and equal			
	opportunity?			
23	How does the LWIA provide			Please learn who is trained, when is the
	disability awareness training for			training held, and how frequently is the
	designated staff at the one-stop			training held.
	center?			<b>0</b>
24	Has the contract agency received			Please review such documents and note
	any discrimination complaints			the appropriate explanation.
	during the last fiscal year or during		Ш	
	the current contract year? Explain.			
25	What assurances of compliance			Please review such signed assurances to
	have been signed by the agency?		Ш	answer these appropriate questions.

	When and by who were they signed?		
26	What documentation does the		Please review documents, and/or
	agency keep as proof of its non-		previous audits, and corrective actions for
	discriminatory status?		such documentation or proof.

#### **MILITARY SERVICES FORM**

Priority of service is the right of every qualifying individual who served in the military or eligible military spouses to receive employment, training, and placement services before non-eligible persons, as long as other provisions of the law are met. Please complete this questionnaire so we can determine your eligibility for services.

SERVED IN THE MILITARY (Section A)						
Date: _						
Full Nam	e:	SSN				
Branch o	f Service:Discharge Type	Dates of Service:	Rank/Rat	e:		
Contact I	nformation: ( )  Home Phone  Cell Phone	Email:				
How ca	n we help you today?					
As a military member or the spouse of one, you may be eligible for additional services if you can attest to belonging to at least one of the criteria below and consider it a barrier to employment:						
1.	A special disabled or disabled veteran; Special disabled and disa					
	entitled to compensation (or who but for the receipt of miles)		be entitled to			
	compensation: under laws administered by the Secretary of			Yes No		
	<ul> <li>were discharged or released from active duty because of a</li> </ul>			Yes No		
2.	Homeless, as defined in Section 103(a) of the Stewart B. McKini	-		∐ Yes ∐ No		
3.	A recently-separated service member, (Within 3 years of End of		any point in the previous 12	∐ Yes ∐ No		
_	months has been unemployed for 27 or more consecutive week					
4.	An offender, who has been released from incarceration within t			∐ Yes ∐ No		
5.	Are you in need of a high school diploma or equivalent certifica	te;		∐ Yes ∐ No		
6.	Low-income (as defined by the State. See attached chart)			∐ Yes ∐ No		
	SERVED IN THE MILITARY AND ARE BE	TWEEN THE AGES O	F 18-24 (Section B)			
1.	Are you between the ages of 18 and 24?			☐ Yes ☐ No		
2.	Do you have limited civilian work history?			☐ Yes ☐ No		
3.	Are you unemployed?			☐ Yes ☐ No		
4.	Are you transitioning from active military service?			☐ Yes ☐ No		
	,					
	OTHER ELIGIB	LE (Section C)				
5.	Do you have a letter from the VA stating you are an eligible spo	use?		□ Yes □ No		
6.	Does your spouse have a total disability from a service-connect			☐ Yes ☐ No		
7.	Has your spouse been listed as forcibly detained or interned by		r nower missing in	☐ Yes ☐ No		
7.	action, or captured in line of duty for a total or more than 90 da		· power, missing m			
8.	Are you the surviving spouse of a veteran who died of a service	-	evaluated by the VA or while h	naving a total		
0.	permanent service-connected disability?	connected disability as	evaluated by the tribine in	Yes No		
9.	Are you a Transitioning Service Member with any of the criteria	as defined in section A	or B?	☐ Yes ☐ No		
	Are you a "Wounded Warrior" currently in a treatment Facility			☐ Yes ☐ No		
	MILITARY DO	OCUMENTS				
11.	Do you have a DD214 in your possession?			Yes No		
12.	Do you have a VA disability rating letter in your possession?			Yes No		
	10	7				

ANNUAL Workforce Investment Income Guidelines 2014						
Family Cina	Donoster I and	LICH* Matro	LICH Non Motor			
Family Size	Poverty Level	LLSIL* - Metro	LLSIL-Non-Metro			
1	\$11,670	\$9,654	\$8,846			
2	\$15,730	\$15,819	\$14,492			
3	\$19,790	\$21,712	\$19,890			
4	\$23,850	\$26,805	\$24,554			
5	\$27,910	\$31,637	\$28,976			
6	\$31,970	\$37,001	\$33,886			
7	\$36,030	\$42,365	\$38,796			
8	\$40,090	\$47,729	\$43,706			
9	\$44,150	\$53,093	\$48,616			
10	\$48,210	\$58,457	\$53,526			
11	\$52,270	\$63,821	\$58,436			
12	\$56,330	\$69,185	\$63,346			
	Add <b>\$4,060</b> for each	Add <b>\$5,364</b> for each	Add <b>\$4,910</b> for each			
	additional family	additional family	additional family			
	member	member	member			

#### \*Lower Living Standard Income Level

To use this chart, compare the poverty level for the family size against either the Metro or Non-Metro LLSIL, depending on the county of residence, using the higher of the two.

#### Note - Metro LLSIL levels can only be used for the following counties:

Anderson, Blount, Bradley, Cannon, Carter, Cheatham, Chester, Davidson, Dickson, Fayette, Grainger, Hamblen, Hamilton, Hawkins, Hickman, Jefferson, Knox, Loudon, Macon, Madison, Marion, Montgomery, Polk, Robertson, Rutherford, Sequatchie, Shelby, Smith, Stewart, Sullivan, Sumner, Tipton, Trousdale, Unicoi, Union, Washington, Williamson, Wilson.

#### (This page is not to be given to the Client)

Staff

If a Veteran answers Yes to any question in section "A" or Yes to question 1 # in section "B" they can see the DVOP if the Discharge type is other than Dishonorable

If a Veteran's Spouse or Other eligible answers Yes to any question in section "C" they can be seen by the DVOP

#### **CROSS REFERENCE**

(**Note**: OMB A-133 has a Supplement. This is updated yearly. All\_Grant recipients must comply with the new supplements.)

	Requirement	Governmental Organizations	Nonprofit Organizations	Institutions of Higher Education	Commercial Organization s
Α.	Uniform Administrative Requirements	29 CFR Part 97	29 CFR Part 95	29 CFR Part 95	29 CFR Part 95 (grants only)
В.	Pre-Award Requirement/Aft er the Award Requirement	29 CFR Part 97.10- 12 29 CFR Part 97.50- 52	29 CFR Part 95.10- 17 29 CFR Part 95.70- 73	29 CFR Part 95.10- 17 29 CFR Part 95.70- 73	
Period of C. Availability and Fund		29 CFR Part 97.23	29 CFR Part 95.28	29 CFR Part 95.28	
D.	Procurement	29 CFR Part 97.36	29 CFR Part 95.40- 48	29 CFR Part 95.40- 48	
E. Allowable/Unal lowable Costs		A-87 Attachment A 29 CFR Part 97.22	A-122 Att. A 29 CFR Part 95.27	A-21 Section C 29 CFR Part 95.27	48 CFR 31.201- 204
F.	Allowable/Unallo wable Activities	A-133	A-133	A-133	
G.	Treatment of Selected Items of Cost	A-87 Attachment B	A-122 Attachment B	A-21 (J)	48 CFR 31.205
Н.	Cash Management	29 CFR Part 97.20.21	29 CFR Part 95.20- 23	29 CFR Part 95.20- 23	
I.	Program Income	29 CFR Part 97.25	29 CFR Part 95.24	29 CFR Part 95.24	
J.	Equipment	29 CFR Part 97.32- 33	29 CFR Part 95.34- 36	29 CFR Part 95.34- 36	
K.	Matching, Level of Effort, Earmarking	29 CFR Part 97.24	29 CFR Part 95.20- 23	29 CFR Part 95.20- 23	
L.	Real Property Acquisition and Relocation Assistance	29 CFR Part 97.31	29 CFR Part 95.30- 37	29 CFR Part 95.30- 37	
M	Lobbying Restrictions	29 CFR Part 93	29 CFR Part 93	29 CFR Part 93	29 CFR Part 93
N.	Suspension and Debarment	29 CFR Part 98 (A- E) 29 CFR 97.35	29 CFR Part 98 (A-E) 29 CFR 95.13	29 CFR Part 98 (A-E) 29 CFR 95.13	29 CFR Part 98 (A-E)
0.	Eligibility	A-133	A-133	A-133	
P.	Drug-Free	29 CFR Part 98 (F)	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98

	Workplace		(F)	(F)	(F)
Q.	Non- Discrimination (Civil Rights)	29 CFR Part 31	29 CFR Part 31	29 CFR Part 31	29 CFR Part 31
R.	Non- Discrimination (Basis of Handicap)	29 CFR Part 32	29 CFR Part 32	29 CFR Part 32	29 CFR Part 32
S.	Age Discrimination of 1975	29 CFR Part 35	29 CFR Part 35	29 CFR Part 35	29 CFR Part 35
T.	EO Requirements (WIA only)	29 CFR Part 37	29 CFR Part 37	29 CFR Part 37	29 CFR Part 37
U.	Reporting	29 CFR Part 29 CFR Part 97.40-42	29 CFR Part 29 CFR Part 95.50-53	29 CFR Part 29 CFR Part 95.50-53	
V.	Audit/Monitoring	29 CFR Part 99	29 CFR Part 99 29 CFR Part 95.5	29 CFR Part 99 29 CFR Part 95.5	29 CFR Part 96

#### Administrative Entity & Comprehensive Career Center Web Site

#### LWIA 1

http://www.ab-t.org/

http://www.tennessee.gov/labor-wfd/cc/cccounty files/washington.htm

#### LWIA 2

http://www.ws.edu/

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/hamblen.htm

#### LWIA 3

http://www.knoxcac.org

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/knox\_universityst.htm

#### LWIA 4

http://www.ethra.org/

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/cumberland.htm

#### LWIA 5

http://www.sedev.org/www

http://www.secareercenter.org/

#### LWIA 6

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/coffee.htm

#### LWIA 7

http://www.uchra.com/

http://www.uccareercenter.com/

#### LWIA 8

http://www.workforceessentials.com/

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/montgomery.htm

#### LWIA 9

http://www.nashville.gov/

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/davidson.htm

#### **LWIA 10**

http://www.sctworkforce.org

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/maury.htm

#### **LWIA 11**

http://www.unitedway.tn.org/

http://www.wtncc.tn.org/

#### **LWIA 12**

http://www.tennessee.gov/labor-wfd/cc/cccounty\_files/dyer.htm

#### **LWIA 13**

http://www.cityofmemphis.org/ http://www.memphiscareercenter.com/

#### **State Web Sites**

#### State Web Sites

http:// www.tnrecovery.gov. This is the homepage for Tennessee's Recovery Act announcements and directives.

http://www.tn.gov/labor-wfd/empwfd.html. This is the homepage of the Division of Workforce Development, Department of Labor and Workforce Development

http://www.tennessee.gov/labor-wfd/wiaplan.html. View the State's 5-Year Strategic Plan for WIA.

http://www.state.tn.us/labor-wfd/et\_incumbent\_faq.html. View Frequently Asked Questions about the Incumbent Worker Program

http://www.state.tn.us/labor-wfd/graphics/TNmplwia.gif. View the LWIA map

http://www.tn.gov/labor-wfd/et\_services\_prog\_mgmt\_plng.html View Workforce Investment Act Policies from Workforce Development

http://www.tn.gov/labor-wfd/et\_services\_prog\_mgmt\_plng\_scsep.html View Senior Community Services Employment Program Policies from Workforce Development

http://www.tennessee.gov/labor-wfd/performancetable2003-04.pdf. Workforce Development Performance Measures, 2005-2006

http://www.tennesseeanytime.org/wiaetpl-app/search.html. View the List of Eligible Training Providers

http://www.lexisnexis.com/hottopics/tncode/ Tennessee Code Annotated ew.tnrecovery.gov/b

#### Federal Web Sites

http://www.doleta.gov/Employment and Training Administration, US Department of Labor

http://www.doleta.gov/usworkforce/wia/act.cfm. View Public Law 105-220, WIA 1998

http://www.whitehouse.gov/omb/egov. View Plans for Government Initiative

http://wdr.doleta.gov/directives/. ETA Training and Employment Guidance Letters/Advisories

http://www.gpoaccess.gov/cfr/index.html. Search the Code of Federal Regulations

http://www.whitehouse.gov/omb/circulars\_a122\_2004 OMB, Circular A-122

http://www.whitehouse.gov/omb/circulars-a133\_complaince\_supplement\_2010 OMB, Circular A-133

http://www.hhs.gov/ocr/ LEP Guidance, ETA

http://www.gpoaccess.gov/uscode Search the United States Code

http://wdr.doleta.gov/opr/fulltext/FINALrep\_02.pdf View the Urban Institute's preliminary report on employment and training activities at faith-based institutions

http://www.eeoc.gov/policy/ada.html View Americans with Disabilities Act of 1990

http://www.access-board.gov/508.htm 36 CFR Part 1194, Electronic and Information Technology Accessibility Standards

http://www.access-board.gov/telecomm/index.htm 36 CFR Part 1193, Telecommunications Act Accessibility Guidelines

# Department of Labor and Workforce Development Annual Agreement Monitoring Information Attachment A As of July 1, 2014

	Recipient Organization	Contract	Contract	Contract	Contract
		Number	Begin date	End date	Amount
LWIA 1	Alliance for Business and Training	LW49F111ADDEI11	10/1/2011	9/30/2014	\$480,000.00
_	Alliance for Business and Training	LW49F122DWRSP12	5/15/2013	6/30/2014	\$270,685.00
	Alliance for Business and Training	LW01F131ADULT13	10/1/2012	6/30/2014	\$780,764.00
	Alliance for Business and Training	LW01F131DSLWK13	10/1/2012	6/30/2014	\$692,837.00
	Alliance for Business and Training	LW49F131TWRSP13	12/15/2012	11/15/2013	\$173,834.00
	Alliance for Business and Training	LW49P111NCNTV12	1/2/2013	12/31/2013	\$27,083.00
	Alliance for Business and Training	LW49P112NCNTV12	2/1/2014	6/30/2014	\$18,218.00
	Alliance for Business and Training	LW49P111DWRSP12	2/5/2014	6/30/2014	\$72,270.00
	Alliance for Business and Training	LW01P121DSLWK13	7/1/2012	6/30/2014	\$119,355.00
	Alliance for Business and Training	LW01P121YOUTH13	4/1/2012	6/30/2014	\$808,265.00
	Alliance for Business and Training	LW49P121IWRSP13	10/26/2012	9/30/2013	\$115,000.00
	Alliance for Business and Training	LW49P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
	Alliance for Business and Training	LW01P121ADULT13	7/1/2012	6/30/2014	\$64,491.00
	Alliance for Business and Training	LW01F141ADULT14	10/1/2013	6/30/2015	\$765,487.00
	Alliance for Business and Training	LW01F141DSLWK14	10/1/2013	6/30/2015	\$591,575.00
	Alliance for Business and Training	LW49F141IWRSP14	1/3/2014	12/31/2014	\$146,898.00
	Alliance for Business and Training	LW01P131YOUTH14	4/1/2013	6/30/2015	\$775,509.00
	Alliance for Business and Training	LW01P131DSLWK14	7/1/2013	6/30/2015	\$62,857.00
	Alliance for Business and Training	LW01P131ADULT14	7/1/2013	6/30/2015	\$20,284.00
	Alliance for Business and Training	LW01P141YOUTH15	4/1/2014	6/30/2016	\$822,322.00
	Alliance for Business and Training	LW01P141ADULT15	7/1/2014	6/30/2016	\$58,897.00
	Alliance for Business and Training	LW01P141DSLWK15	7/1/2014	6/30/2016	\$106,715.00
	Total Amount				\$6,989,019.00
LWIA 02	Walters State Community College	LW41F122DWRSP12	5/15/2013	6/30/2014	\$145,607.00

LW02F131ADULT13	10/1/2012	6/30/2014	\$1,153,370.00
			\$915,913.00
			\$90,000.00
			\$52,800.00
		l	\$27,083.00
		I	\$27,548.00
			\$95,267.00
			\$157,784.00
			\$1,287,044.00
			\$15,673.00
			\$1,159,554.00
	· ·		\$761,295.00
			\$50,000.00
			\$1,118,049.00
			\$30,726.00
LW02P131DSLWK14	7/1/2013	6/30/2015	\$80,890.00
LW02P141ADULT15	7/1/2014	6/30/2016	\$89,388.00
LW02P141DSLWK15	7/1/2014	6/30/2016	\$155,839.00
LW02P141YOUTH15	4/1/2014	6/30/2016	\$1,188,455.00
			\$8,602,285.00
	LW02P141DSLWK15	LW02F131DSLWK13 LW41F131IWRSP13 LW41F132TWRSP13 LW41P111NCNTV12 LW41P112NCNTV12 LW02P121ADULT13 LW02P121DSLWK13 LW02P121YOUTH13 LW02F141ADULT14 LW02F141DSLWK14 LW02F141DSLWK14 LW02P131YOUTH14 LW02P131YOUTH14 LW02P131ADULT14 LW02P131ADULT14 LW02P131ADULT14 LW02P131DSLWK14 LW02P141ADULT15 T/1/2013 T/1/2014	LW02F131DSLWK13       10/1/2012       6/30/2014         LW41F131IWRSP13       10/26/2012       9/30/2013         LW41F132TWRSP13       12/15/2012       11/15/2013         LW41P111NCNTV12       1/2/2013       12/31/2013         LW41P112NCNTV12       2/1/2014       6/30/2014         LW02P121ADULT13       7/1/2012       6/30/2014         LW02P121DSLWK13       7/1/2012       6/30/2014         LW02P121YOUTH13       4/1/2012       6/30/2014         LW41P121NCNTV13       3/17/2014       6/30/2015         LW02F141ADULT14       10/1/2013       6/30/2015         LW02F141DSLWK14       10/1/2013       6/30/2015         LW02P131YOUTH14       4/1/2013       6/30/2015         LW02P131ADULT14       7/1/2013       6/30/2015         LW02P131DSLWK14       7/1/2013       6/30/2015         LW02P141ADULT15       7/1/2014       6/30/2016         LW02P141DSLWK15       7/1/2014       6/30/2016

LWIA 03	Workforce Connections	LW42F111ADDEI11	10/1/2011	9/30/2014	\$480,000.00
=	Workforce Connections	LW42F122DWRSP12	5/15/2013	6/30/2014	\$115,404.00
	Workforce Connections	LW03F131ADULT13	10/1/2012	6/30/2014	\$755,562.00
	Workforce Connections	LW03F131DSLWK13	10/1/2012	6/30/2014	\$667,750.00
	Workforce Connections	LW42F131TWRSP13	12/15/2012	11/15/2013	\$77,245.00
	Workforce Connections	LW42P111NCNTV12	1/2/2013	12/31/2013	\$27,083.00
	Workforce Connections	LW42P112NCNTV12	2/1/2014	6/30/2014	\$21,126.00
	Workforce Connections	LW03P121ADULT13	7/1/2012	6/30/2014	\$62,409.00
	Workforce Connections	LW03P121DSLWK13	7/1/2012	6/30/2014	\$115,033.00
	Workforce Connections	LW03P121YOUTH13	4/1/2012	6/30/2014	\$729,823.00
	Workforce Connections	LW42P121IWRSP13	10/26/2012	9/30/2013	\$60,000.00
	Workforce Connections	LW42P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
	Workforce Connections	LW03F141ADULT14	10/1/2013	6/30/2015	\$684,472.00

	Workforce Connections	LW03F141DSLWK14	10/1/2013	6/30/2015	\$819,371.00
	Workforce Connections	LW03P133YOUTH14	4/1/2013	6/30/2015	\$834,560.00
	Workforce Connections	LW03P131ADULT14	7/1/2013	6/30/2015	\$18,137.00
	Workforce Connections	LW03P131DSLWK14	7/1/2013	6/30/2015	\$87,061.00
	Workforce Connections	LW03P141ADULT15	7/1/2014	6/30/2016	\$53,722.00
	Workforce Connections	LW03P141DSLWK15	7/1/2014	6/30/2016	\$117,445.00
	Workforce Connections	LW03P141YOUTH15	4/1/2014	6/30/2016	\$915,136.00
	Total Amount				\$6,657,012.00
WIA 04	East TN Human Resource Agency	LW39F122JCRSP12	8/23/2012	12/31/2013	\$8,800.00
	East TN Human Resource Agency	LW04F131ADULT13	10/1/2012	6/30/2014	\$1,049,627.00
	East TN Human Resource Agency	LW04F131DSLWK13	10/1/2012	6/30/2014	\$757,708.00
	East TN Human Resource Agency	LW39F131IWRSP13	10/26/2012	9/30/2013	\$100,000.00
	East TN Human Resource Agency	LW39F132TWRSP13	12/15/2012	11/15/2013	\$43,572.00
	East TN Human Resource Agency	LW39F133IWRSP13	1/3/2014	12/31/2014	\$83,498.00
	East TN Human Resource Agency	LW39P111NCNTV12	1/2/2013	12/31/2013	\$27,083.00
	East TN Human Resource Agency	LW39P112NCNTV12	2/1/2014	6/30/2014	\$19,436.00
	East TN Human Resource Agency	LW04P121ADULT13	7/1/2012	6/30/2014	\$86,698.00
	East TN Human Resource Agency	LW04P121DSLWK13	7/1/2012	6/30/2014	\$130,530.00
	East TN Human Resource Agency	LW04P121YOUTH13	4/1/2012	6/30/2014	\$1,161,169.00
	East TN Human Resource Agency	LW39P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
	East TN Human Resource Agency	LW04F141ADULT14	10/1/2013	6/30/2015	\$1,056,539.00
	East TN Human Resource Agency	LW04F141DSLWK14	10/1/2013	6/30/2015	\$1,351,053.00
	East TN Human Resource Agency	LW04P131YOUTH14	4/1/2013	6/30/2015	\$961,927.88
	East TN Human Resource Agency	LW04P131ADULT14	7/1/2013	6/30/2015	\$27,996.00
	East TN Human Resource Agency	LW04P131DSLWK14	7/1/2013	6/30/2015	\$143,553.00
	East TN Human Resource Agency	LW04P141ADULT15	7/1/2014	6/30/2016	\$82,938.00
	East TN Human Resource Agency	LW04P141DSLWK15	7/1/2014	6/30/2016	\$154,444.00
	East TN Human Resource Agency	LW04P141YOUTH15	4/1/2014	6/30/2016	\$1,092,429.00
	Total Amount				\$8,354,673.88
-WIA 05	Southeast TN Developmental District	LW52F124DWRSP12	5/15/2013	6/30/2014	\$201,584.00
	Southeast TN Developmental District	LW05F131ADULT13	10/1/2012	6/30/2014	\$1,234,521.00
	Southeast TN Developmental District	LW05F131DSLWK13	10/1/2012	6/30/2014	\$786,027.00

	Southeast TN Developmental District	LW52F131IWRSP13	10/26/2012	9/30/2013	\$100,000.00
	Southeast TN Developmental District	LW52F132TWRSP13	12/15/2012	11/15/2013	\$80,000.00
	Southeast TN Developmental District	LW52P111NCNTV12	12/20/2012	12/31/2013	\$27,083.00
	Southeast TN Developmental District	LW52P112NCNTV12	2/1/2014	6/30/2014	\$22,647.00
	Southeast TN Developmental District	LW52P112ADSWA12	10/1/2013	12/31/2013	\$150,000.00
	Southeast TN Developmental District	LW05P121ADULT13	7/1/2012	6/30/2014	\$101,970.00
	Southeast TN Developmental District	LW05P121DSLWK13	7/1/2012	6/30/2014	\$135,408.00
	Southeast TN Developmental District	LW05P121YOUTH13	4/1/2012	6/30/2014	\$1,361,125.00
	Southeast TN Developmental District	LW52P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
	Southeast TN Developmental District	LW05F141ADULT14	10/1/2013	6/30/2015	\$1,268,330.00
	Southeast TN Developmental District	LW05F141DSLWK14	10/1/2013	6/30/2015	\$1,666,640.00
	Southeast TN Developmental District	LW05P131YOUTH14	4/1/2013	6/30/2015	\$1,342,444.00
	Southeast TN Developmental District	LW05P131ADULT14	7/1/2013	6/30/2015	\$33,608.00
	Southeast TN Developmental District	LW05P131DSLWK14	7/1/2013	6/30/2015	\$177,086.00
	Southeast TN Developmental District	LW52P131IWRSP14	1/3/2014	12/31/2014	\$48,850.00
	Southeast TN Developmental District	LW05P141ADULT15	7/1/2014	6/30/2016	\$98,489.00
	Southeast TN Developmental District	LW05P141DSLWK15	7/1/2014	6/30/2016	\$198,735.00
	Southeast TN Developmental District	LW05P141YOUTH15	4/1/2014	6/30/2016	\$1,436,176.00
					\$10,486,396.00
6	Workforce Solutions	LW43F121IWRSP12	10/26/2012	9/30/2013	\$38,500.00
	Workforce Solutions	LW43F122DWRSP12	5/15/2013	6/30/2014	\$498,895.00
	Workforce Solutions	LW06F131ADULT13	10/1/2012	6/30/2014	\$540,276.00
	Workforce Solutions	LW06F131DSLWK13	10/1/2012	6/30/2014	\$295,123.00
	Workforce Solutions	LW43F131TWRSP13	12/15/2012	11/15/2013	\$81,201.00
	Workforce Solutions	LW43F132IWRSP13	1/3/2014	12/31/2014	\$25,000.00
	Workforce Solutions	LW43P111NCNTV12	1/2/2013	12/31/2013	\$90,417.00
	Workforce Solutions	LW43P112IWRSP12	10/26/2012	9/30/2013	\$21,500.00
	Workforce Solutions	LW43P112NCNTV12	2/1/2014	6/30/2014	\$24,337.00
	Workforce Solutions	LW06P121YOUTH13	4/1/2012	6/30/2014	\$569,546.00
	Workforce Solutions	LW43P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
	Workforce Solutions	LW06P121ADULT13	7/1/2012	6/30/2014	\$44,626.00
	Workforce Solutions	LW06P121DSLWK13	7/1/2012	6/30/2014	\$50,841.00
	Workforce Solutions	LW06F141ADULT14	10/1/2013	6/30/2015	\$516,084.00

LWIA 06

Workforce Solutions	LW06F141DSLWK14	10/1/2013	6/30/2015	\$364,603.00
Workforce Solutions	LW06P131YOUTH14	4/1/2013	6/30/2015	\$509,070.00
Workforce Solutions	LW06P131DSLWK14	7/1/2013	6/30/2015	\$38,740.00
Workforce Solutions	LW06P131ADULT14	7/1/2013	6/30/2015	\$13,675.00
Workforce Solutions	LW06P141ADULT15	7/1/2014	6/30/2016	\$37,831.00
Workforce Solutions	LW06P141DSLWK15	7/1/2014	6/30/2016	\$67,511.00
Workforce Solutions	LW06P141YOUTH15	4/1/2014	6/30/2016	\$512,699.00
Total				\$4,356,148.00
Upper Cumberland HRA	LW40F123DWRSP12	5/15/2013	6/30/2014	\$111,482.00
Upper Cumberland HRA	LW07F131ADULT13	10/1/2012	6/30/2014	\$592,653.00
Upper Cumberland HRA	LW07F131DSLWK13	10/1/2012	6/30/2014	\$440,866.00
Upper Cumberland HRA	LW40F131IWRSP13	10/26/2012	9/30/2013	\$60,000.00
Upper Cumberland HRA	LW40F132TWRSP13	12/15/2012	11/15/2013	\$50,000.00
Upper Cumberland HRA	LW40P111NCNTV12	1/2/2013	12/31/2013	\$27,083.00
Upper Cumberland HRA	LW40P112NCNTV12	2/1/2014	6/30/2014	\$16,901.00
Upper Cumberland HRA	LW07P121DSLWK13	7/1/2012	6/30/2014	\$75,948.00
Upper Cumberland HRA	LW07P121YOUTH13	4/1/2012	6/30/2014	\$619,751.00
Upper Cumberland HRA	LW40P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
Upper Cumberland HRA	LW07P121ADULT13	7/1/2015	6/30/2014	\$48,953.00
Upper Cumberland HRA	LW07F141ADULT14	10/1/2013	6/30/2015	\$583,233.00
Upper Cumberland HRA	LW07F141DSLWK14	10/1/2013	6/30/2015	\$421,172.00
Upper Cumberland HRA	LW07P131YOUTH14	4/1/2013	6/30/2015	\$579,889.00
Upper Cumberland HRA	LW07P131DSLWK14	7/1/2013	6/30/2015	\$44,751.00
Upper Cumberland HRA	LW07P131ADULT14	7/1/2013	6/30/2015	\$15,455.00
Upper Cumberland HRA	LW07P141ADULT15	7/1/2014	6/30/2016	\$45,208.00
Upper Cumberland HRA	LW07P141DSLWK15	7/1/2014	6/30/2016	\$45,208.00
Upper Cumberland HRA	LW07P141YOUTH15	4/1/2014	6/30/2016	\$619,817.00
Total				\$4,414,043.00
Workforce Essentials, Inc	LW48F111ADDEI11	10/1/2011	9/30/2014	\$480,000.00
Workforce Essentials, Inc	LW48F122DWRSP12	5/15/2013	6/30/2014	\$324,750.00
Workforce Essentials, Inc	LW08F131ADULT13	10/1/2012	6/30/2014	\$1,114,735.00
Workforce Essentials, Inc	LW08F131DSLWK13	10/1/2012	6/30/2014	\$1,138,876.00

Workforce Essentials, Inc	LW48F131IWRSP13 LW48F132TWRSP13 LW48P111NCNTV12 LW48P112NCNTV12 LW08P121ADULT13 LW08P121DSLWK13 LW08P121YOUTH13	10/26/2012 12/15/2012 1/2/2013 2/1/2014 7/1/2012 7/1/2012	9/30/2013 11/15/2013 12/31/2013 6/30/2014 6/30/2014 6/30/2014	\$99,422.16 \$72,200.00 \$80,417.00 \$34,646.00 \$92,076.00
Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc	LW48P111NCNTV12 LW48P112NCNTV12 LW08P121ADULT13 LW08P121DSLWK13 LW08P121YOUTH13	1/2/2013 2/1/2014 7/1/2012 7/1/2012	12/31/2013 6/30/2014 6/30/2014	\$80,417.00 \$34,646.00 \$92,076.00
Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc	LW48P112NCNTV12 LW08P121ADULT13 LW08P121DSLWK13 LW08P121YOUTH13	2/1/2014 7/1/2012 7/1/2012	6/30/2014 6/30/2014	\$34,646.00 \$92,076.00
Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc	LW08P121ADULT13 LW08P121DSLWK13 LW08P121YOUTH13	7/1/2012 7/1/2012	6/30/2014	\$92,076.00
Workforce Essentials, Inc Workforce Essentials, Inc Workforce Essentials, Inc	LW08P121DSLWK13 LW08P121YOUTH13	7/1/2012		
Workforce Essentials, Inc Workforce Essentials, Inc	LW08P121YOUTH13		6/30/2014	
Workforce Essentials, Inc			• •	\$196,193.00
·		4/1/2012	6/30/2014	\$1,252,658.00
Workforce Essentials, Inc	LW48P121NCNTV13	3/17/2014	6/30/2015	\$68,173.00
	LW08P121AENCNTV	10/1/2013	6/30/2015	\$43,123.81
Workforce Essentials, Inc	LW08F141ADULT14	10/1/2013	6/30/2015	\$1,149,376.00
Workforce Essentials, Inc	LW08F141DSLWK14	10/1/2013	6/30/2015	\$1,008,459.00
Workforce Essentials, Inc	LW48F141IWRSP14	1/3/2014	12/31/2014	\$126,634.00
Workforce Essentials, Inc	LW48F141JCSWA14	5/1/2014	6/30/2016	\$100,000.00
Workforce Essentials, Inc	LW08P131YOUTH14	4/1/2013	6/30/2015	\$1,187,987.00
Workforce Essentials, Inc	LW08P131ADULT14	7/1/2013	6/30/2015	\$30,456.00
Workforce Essentials, Inc	LW08P131DSLWK14	7/1/2013	6/30/2015	\$107,152.00
Workforce Essentials, Inc	LW08P141ADULT15	7/1/2014	6/30/2016	\$83,656.00
· · · · · · · · · · · · · · · · · · ·			• •	
Workforce Essentials, Inc	LW08P141YOUTH15	4/1/2014	6/30/2016	
				\$10,160,945.97
LWIA 09 Nashville Career Advancement Cen	nter LW09F122DWRSP12	5/15/2013	6/30/2014	\$429,582.00
Nashville Career Advancement Cen	nter LW09F131ADULT13	10/1/2012	6/30/2014	\$1,903,054.00
Nashville Career Advancement Cen	nter LW09F131DSLWK13	10/1/2012	6/30/2014	\$1,829,917.00
Nashville Career Advancement Cen	nter LW09F131IWRSP13	10/26/2012	9/30/2013	\$100,000.00
Nashville Career Advancement Cen	nter LW09F132TWRSP13	12/15/2012	11/15/2013	\$55,000.00
Nashville Career Advancement Cen	nter LW09P111NCNTV12	1/2/2013	12/31/2013	\$27,083.00
Nashville Career Advancement Cen	nter LW09P112NCNTV12	2/1/2014	6/30/2014	\$41,744.00
Nashville Career Advancement Cen	nter LW09P121ADULT13	7/1/2012	6/30/2014	\$157,191.00
	nter LW09P121DSLWK13	7/1/2012	6/30/2014	\$315,238.00
Nashville Career Advancement Cen	ICCI PARODI TETEDOPAKETO			
Nashville Career Advancement Cen Nashville Career Advancement Cen		4/1/2012	6/30/2014	\$2,038,772.00
	nter LW09P121YOUTH13		6/30/2014 6/30/2015	\$2,038,772.00 \$68,173.00
Nashville Career Advancement Cen	nter LW09P121YOUTH13 LW09P121NCNTV13	4/1/2012		
Workforce Essentials, Inc Workforce Essentials, Inc  Workforce Essentials, Inc  LWIA 09 Nashville Career Advancement Cen	LW08P141DSLWK15 LW08P141YOUTH15  Ther LW09F122DWRSP12 LW09F131ADULT13 LW09F131DSLWK13 LW09F131IWRSP13 LW09F132TWRSP13 LW09F132TWRSP13 LW09P111NCNTV12 LW09P112NCNTV12 LW09P121ADULT13	7/1/2014 4/1/2014 5/15/2013 10/1/2012 10/1/2012 10/26/2012 12/15/2012 1/2/2013 2/1/2014 7/1/2012	6/30/2016 6/30/2016 6/30/2014 6/30/2014 6/30/2014 9/30/2013 11/15/2013 12/31/2013 6/30/2014 6/30/2014	\$179,621.00 \$1,190,335.00 \$10,160,945.97 \$429,582.00 \$1,903,054.00 \$1,829,917.00 \$100,000.00 \$55,000.00 \$27,083.00 \$41,744.00 \$157,191.00

Na	ashville Career Advancement Center	LW09F141IWRSP14	1/3/2014	12/31/2014	\$63,000.00
Na	ashville Career Advancement Center	LW09P131YOUTH14	4/1/2013	6/30/2015	\$2,054,161.00
Na	ashville Career Advancement Center	LW09P131ADULT14	7/1/2013	6/30/2015	\$48,896.00
Na	ashville Career Advancement Center	LW09P131DSLWK14	7/1/2013	6/30/2015	\$229,686.00
Na	ashville Career Advancement Center	LW09P141ADULT15	7/1/2014	6/30/2016	\$131,330.00
Na	ashville Career Advancement Center	LW09P141DSLWK15	7/1/2014	6/30/2016	\$287,877.00
Na	ashville Career Advancement Center	LW09P141YOUTH15	4/1/2014	6/30/2016	\$2,022,571.00
					\$15,810,247.00
LWIA 10 So	outh Central TN Workforce Alliance	LW53F122JCRSP12	7/15/2012	6/30/2014	\$55,000.00
So	outh Central TN Workforce Alliance	LW53F124DWRSP12	5/15/2013	6/30/2014	\$449,525.00
So	outh Central TN Workforce Alliance	LW53F123JCRSP12	2/11/2013	6/30/2014	\$65,000.00
So	outh Central TN Workforce Alliance	LW53F125IWRSP12	1/3/2014	6/30/2014	\$20,500.00
So	outh Central TN Workforce Alliance	LW10F131ADULT13	10/1/2012	6/30/2014	\$636,777.00
So	outh Central TN Workforce Alliance	LW10F131DSLWK13	10/1/2012	6/30/2014	\$502,354.00
So	outh Central TN Workforce Alliance	LW53F131IWRSP13	10/26/2012	9/30/2013	\$75,000.00
So	outh Central TN Workforce Alliance	LW53F132TWRSP13	12/15/2012	11/15/2013	\$75,000.00
So	outh Central TN Workforce Alliance	LW53P111ADDEI12	10/1/2011	9/30/2014	\$479,270.00
So	outh Central TN Workforce Alliance	LW53P111NCNTV12	1/20/2013	12/31/2013	\$14,583.00
So	outh Central TN Workforce Alliance	LW53P112NCNTV12	2/1/2014	6/30/2014	\$26,370.00
So	outh Central TN Workforce Alliance	LW53P112ADSWA12	10/1/2013	12/31/2013	\$140,000.00
So	outh Central TN Workforce Alliance	LW10P121ADULT13	7/1/2012	6/30/2014	\$52,597.00
So	outh Central TN Workforce Alliance	LW10P121DSLWK13	7/1/2012	6/30/2014	\$86,540.00
So	outh Central TN Workforce Alliance	LW10P121YOUTH13	4/1/2012	6/30/2014	\$710,079.00
	outh Central TN Workforce Alliance	LW10P121AENCNTV	10/1/2013	6/30/2015	\$43,123.81
So	outh Central TN Workforce Alliance	LW53P121IWRSP13	1/3/2014	12/31/2014	\$26,661.00
So	outh Central TN Workforce Alliance	LW53P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
	outh Central TN Workforce Alliance	LW10F141ADULT14	10/1/2013	6/30/2015	\$611,535.00
	outh Central TN Workforce Alliance	LW10F141DSLWK14	10/1/2013	6/30/2015	\$504,567.00
	outh Central TN Workforce Alliance	LW10P131YOUTH14	4/1/2013	6/30/2015	\$634,771.00
	outh Central TN Workforce Alliance	LW10P131ADULT14	7/1/2013	6/30/2015	\$16,205.00
	outh Central TN Workforce Alliance	LW10P131DSLWK14	7/1/2013	6/30/2015	\$53,612.00
	outh Central TN Workforce Alliance	LW10P141ADULT15	7/1/2014	6/30/2016	\$45,666.00
So	outh Central TN Workforce Alliance	LW10P141DSLWK15	7/1/2014	6/30/2016	\$79,190.00

	South Central TN Workforce Alliance	LW10P141YOUTH15	4/1/2014	6/30/2016	\$652,920.00
					\$6,072,518.81
LWIA 11	Southwest Human Resource Agency	LW45F122DWRSP12	5/15/2013	6/30/2014	\$40,983.00
	Southwest Human Resource Agency	LW11F131ADULT13	10/1/2012	6/30/2014	\$656,877.00
	Southwest Human Resource Agency	LW11F131DSLWK13	10/1/2012	6/30/2014	\$569,915.00
	Southwest Human Resource Agency	LW45F131IWRSP13	10/26/2012	9/30/2013	\$100,000.00
	Southwest Human Resource Agency	LW45F132TWRSP13	12/15/2012	11/15/2013	\$74,910.00
	Southwest Human Resource Agency	LW45P112NCNTV12	1/2/2013	12/31/2013	\$12,500.00
	Southwest Human Resource Agency	LW45P113NCNTV12	2/1/2014	6/30/2014	\$19,605.00
	Southwest Human Resource Agency	LW11P121ADULT13	7/1/2012	6/30/2014	\$54,258.00
	Southwest Human Resource Agency	LW11P121DSLWK13	7/1/2012	6/30/2014	\$98,179.00
	Southwest Human Resource Agency	LW11P121YOUTH13	4/1/2012	6/30/2014	\$752,772.00
	Southwest Human Resource Agency	LW45P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
	Southwest Human Resource Agency	LW11F141ADULT14	10/1/2013	6/30/2015	\$655,030.00
	Southwest Human Resource Agency	LW11F141DSLWK14	10/1/2013	6/30/2015	\$466,408.00
	Southwest Human Resource Agency	LW11P131YOUTH14	4/1/2013	6/30/2015	\$657,325.00
	Southwest Human Resource Agency	LW11P131DSLWK14	7/1/2013	6/30/2015	\$49,557.00
	Southwest Human Resource Agency	LW11P131ADULT14	7/1/2013	6/30/2015	\$17,357.00
	Southwest Human Resource Agency	LW11P141ADULT15	7/1/2014	6/30/2016	\$51,360.00
	Southwest Human Resource Agency	LW11P141DSLWK15	7/1/2014	6/30/2016	\$99,294.00
	Southwest Human Resource Agency	LW11P141YOUTH15	4/1/2014	6/30/2016	\$653,359.32
LWIA 12	Dyersburg State Community College	LW50F121DWNEG12	10/1/2011	3/31/2014	\$2,737,800.00
<del>-</del>	Dyersburg State Community College	LW50F122IWRSP12	2/6/2013	9/30/2013	\$25,000.00
	Dyersburg State Community College	LW50F123DWRSP12	5/15/2013	6/30/2014	\$427,174.00
	Dyersburg State Community College	LW12F131ADULT13	10/1/2012	6/30/2014	\$898,853.00
	Dyersburg State Community College	LW12F131DSLWK13	10/1/2012	6/30/2014	\$1,586,103.00
	Dyersburg State Community College	LW50F131IWRSP13	10/10/2012	9/30/2013	\$75,000.00
	Dyersburg State Community College	LW50F132IWRSP13	12/15/2012	11/15/2013	\$188,000.00
	Dyersburg State Community College	LW50P111NCNTV12	1/2/2013	12/31/2013	\$85,416.00
	Dyersburg State Community College	LW50P112NCNTV12	2/1/2014	6/30/2014	\$17,746.00
	Dyersburg State Community College	LW12P121ADULT13	7/1/2012	6/30/2014	\$74,245.00

	1	l	l	
				\$273,237.00
		1	• •	\$1,016,921.00
				\$73,536.00
				\$92,288.00
, ,	LW50P123JCRSP13			\$60,000.00
Dyersburg State Community College	LW50P121NCNTV13	3/17/2014	6/30/2015	\$15,673.00
Dyersburg State Community College	LW12F141ADULT14	10/1/2013	6/30/2015	\$987,903.00
Dyersburg State Community College	LW12F141DSLWK14	10/1/2013	6/30/2015	\$1,302,746.00
Dyersburg State Community College	LW50F141IWRSP14	1/3/2014	12/31/2014	\$97,549.00
Dyersburg State Community College	LW12P131YOUTH14	4/1/2013	6/30/2015	\$1,005,470.00
Dyersburg State Community College	LW12P131ADULT14	7/1/2013	6/30/2015	\$26,178.00
Dyersburg State Community College	LW12P131DSLWK14	7/1/2013	6/30/2015	\$138,421.00
Dyersburg State Community College	LW12P141ADULT15	7/1/2014	6/30/2016	\$78,698.00
Dyersburg State Community College	LW12P141DSLWK15	7/1/2014	6/30/2016	\$148,465.00
Dyersburg State Community College	LW12P141YOUTH15	4/1/2014	6/30/2016	\$1,105,122.00
				\$12,537,544.00
City of Memphis (WIN)	LW13F122DWRSP12	5/15/2013	6/30/2014	\$248,168.00
City of Memphis (WIN)	LW13F131ADULT13	10/1/2012	6/30/2014	\$2,202,300.00
City of Memphis (WIN)	LW13F131DSLWK13	10/1/2012	6/30/2014	\$2,357,830.00
City of Memphis (WIN)	LW13F131IWRSP13	10/26/2012	9/30/2013	\$90,000.00
City of Memphis (WIN)	LW13F133IWRSP13	1/3/2014	12/31/2014	\$60,550.00
City of Memphis (WIN)	LW13F132TWRSP13	12/15/2012	11/15/2013	\$97,738.00
City of Memphis (WIN)	LW13P111ADDEI12	10/1/2011	9/30/2014	\$425,000.00
City of Memphis (WIN)	LW13P112NCNTV12	2/1/2014	6/30/2014	\$46,476.00
City of Memphis (WIN)	LW13P111NCNTV12	1/2/2013	12/31/2013	\$27,083.00
City of Memphis (WIN)	LW13P121ADULT13	7/1/2012	6/30/2014	\$181,908.00
City of Memphis (WIN)	LW13P121DSLWK13	7/1/2012	6/30/2014	\$406,181.00
City of Memphis (WIN)	LW13P121YOUTH13	4/1/2012	6/30/2014	\$2,686,989.00
City of Memphis (WIN)	LW13P121NCNTV13	3/17/2014	6/30/2015	\$6,923.00
City of Memphis (WIN)	LW13F141ADULT14	10/1/2013	6/30/2015	\$2,325,325.00
City of Memphis (WIN)	LW13F141DSLWK14	10/1/2013	6/30/2015	\$1,681,945.00
	1	4/4/2042	C /20 /2015	¢2 F0C 2F4 00
City of Memphis (WIN)	LW13P131YOUTH14	4/1/2013	6/30/2015	\$2,586,254.00
	Dyersburg State Community College City of Memphis (WIN)	Dyersburg State Community College Dyersb	Dyersburg State Community College         LW12P121YOUTH13         4/1/2012           Dyersburg State Community College         LW50P121FTRSP13         1/1/2014           Dyersburg State Community College         LW50P12JCRSP13         1/1/2014           Dyersburg State Community College         LW50P12JCRSP13         4/15/2014           Dyersburg State Community College         LW50P12JNCNTV13         3/17/2014           Dyersburg State Community College         LW12F141ADULT14         10/1/2013           Dyersburg State Community College         LW12F141DSLWK14         10/1/2013           Dyersburg State Community College         LW12F141DSLWK14         10/1/2013           Dyersburg State Community College         LW12P131ADULT14         4/1/2013           Dyersburg State Community College         LW12P131ADULT14         7/1/2013           Dyersburg State Community College         LW12P131DSLWK14         7/1/2013           Dyersburg State Community College         LW12P141DSLWK15         7/1/2014           Dyersburg State Community College         LW12P141DSLWK15         7/1/2014           Dyersburg State Community College         LW12P141DSLWK15         7/1/2014           Dyersburg State Community College         LW13F131DSLWK13         10/1/2014           City of Memphis (WIN)         LW13F131DSLWK13         10/1/2012 <td>Dyersburg State Community College         LW12P121YOUTH13         4/1/2012         6/30/2014           Dyersburg State Community College         LW50P121FTRSP13         1/1/2014         12/31/2014           Dyersburg State Community College         LW50P122ICRSP13         1/1/2014         12/31/2014           Dyersburg State Community College         LW50P122ICRSP13         4/15/2014         6/30/2015           Dyersburg State Community College         LW50P121INCNTV13         3/17/2014         6/30/2015           Dyersburg State Community College         LW12F141ADULT14         10/1/2013         6/30/2015           Dyersburg State Community College         LW12F141DSLWK14         10/1/2013         6/30/2015           Dyersburg State Community College         LW12P131YOUTH14         4/1/2013         6/30/2015           Dyersburg State Community College         LW12P131ADULT14         7/1/2013         6/30/2015           Dyersburg State Community College         LW12P131DSLWK14         7/1/2013         6/30/2015           Dyersburg State Community College         LW12P141DULT15         7/1/2014         6/30/2016           Dyersburg State Community College         LW12P141DULT15         7/1/2014         6/30/2016           Dyersburg State Community College         LW12P141DULT15         7/1/2014         6/30/2016</td>	Dyersburg State Community College         LW12P121YOUTH13         4/1/2012         6/30/2014           Dyersburg State Community College         LW50P121FTRSP13         1/1/2014         12/31/2014           Dyersburg State Community College         LW50P122ICRSP13         1/1/2014         12/31/2014           Dyersburg State Community College         LW50P122ICRSP13         4/15/2014         6/30/2015           Dyersburg State Community College         LW50P121INCNTV13         3/17/2014         6/30/2015           Dyersburg State Community College         LW12F141ADULT14         10/1/2013         6/30/2015           Dyersburg State Community College         LW12F141DSLWK14         10/1/2013         6/30/2015           Dyersburg State Community College         LW12P131YOUTH14         4/1/2013         6/30/2015           Dyersburg State Community College         LW12P131ADULT14         7/1/2013         6/30/2015           Dyersburg State Community College         LW12P131DSLWK14         7/1/2013         6/30/2015           Dyersburg State Community College         LW12P141DULT15         7/1/2014         6/30/2016           Dyersburg State Community College         LW12P141DULT15         7/1/2014         6/30/2016           Dyersburg State Community College         LW12P141DULT15         7/1/2014         6/30/2016

Grand Total				\$119,830,351.27
Knox Co S Knox Co Schools	LW03P111AENCNTV	10/1/2013	6/30/2014	\$81,213.00
	LW01P121AENCNTV	10/1/2013	6/30/2015	\$43,123.81
Hope wor Hope works, Inc.	LW01P111AENCNTV	10/1/2013	6/30/2014	\$6,787.00
Chattano: Chattanooga St Community College	LW05P111AENCNTV	10/1/2013	6/30/2014	\$4,093.48
	LW18P131ADSWA14	7/1/2013	6/30/2014	\$424,466.00
University University of Memphis	LW18P111ADDEI12	10/1/2011	9/30/2014	\$145,399.00
	LW17F141DWRSP14	7/1/2014	6/30/2015	\$100,000.00
Tennesse: Tennessee AFL-CIO	LW17F131DWRSP13	6/30/2013	6/30/2014	\$150,000.00
	LW72P121NCNTV13	4/15/2014	6/30/2014	\$60,000.00
<b>Southwes</b> Southwest TN Developmental District	LW72P111NCNTV12	2/1/2014	6/30/2014	\$62,500.00
Shelby Co Shelby Co Schools	LW13P111AENCNTV	10/1/2013	6/30/2014	\$199,475.00
Miscellaneous				
				\$19,067,099.00
City of Memphis (WIN)	LW13P141YOUTH15	4/1/2014	6/30/2016	\$2,783,767.00
City of Memphis (WIN)	LW13P141DSLWK15	7/1/2014	6/30/2016	\$430,456.00
City of Memphis (WIN)	LW13P141ADULT15	7/1/2014	6/30/2016	\$181,879.00
City of Memphis (WIN)	LW13P131DSLWK14	7/1/2013	6/30/2015	\$178,711.00

Workforce Investment Act of 1998, Risk Assessment of LWIAs														
·														
Name of Organization: Tennessee Department of Labor and Workforce I	Development repo	rt date 9	/30/2014											
Exhibit 7				0	4		•	7	0	•	40	44	40	40
LOCAL WORKFORCE INVESTMENT AREAS		1	2	3	4	5	6	7	8	9	10	11	12	13
Risk Categories	VALUES													
1. FEDERAL FUNDS EXPENDED DURING A FISCAL YEAR:														
< \$25,000	1													
> \$25,000 AND < \$100,000	2													
> \$100,000 AND <\$200,000	3													
> \$200,000 AND <\$300,000	4													
> \$300,000	5	5	5	5	5	5	5	5	5	5	5	5	5	5
2.PERCENT EXPENDED OF FEDERAL GRANTS:														
< 80%	1													
<60%	2	2	2	2	2	2	2	2	2	2	2	2	2	2
< 50%	3													
< 30%	4													
< 10%	5													
3. MONITORING JUDGEMENT RISK:														
Little concern; review on request or monitor's discretion **	1													
Low concern; review every 5 years	2													
Moderate concern; review every 3-4 years	3													
Fairly high concern; review every 2 years	4													
High audit concern; review annually	5	5	5	5	5	5	5	5	5	5	5	5	5	5
4. INTERNAL CONTROL:														
Average	1			1							1		1	
Minor weaknesses	2	2	2		2	2	2	2	2	2				
Some significant weaknesses	3											3		3
Many significant weaknesses or no audit	4													
SUB-TOTAL		14	14	13	14	14	14	14	14	14	13	15	13	15

Name of Organization: Tennessee Department of Labor and Workforce	Development													
LOCAL WORKFORCE INVESTMENT AREAS		1	2	3	4	5	6	7	8	9	10	11	12	13
Risk Categories	VALUES													
5. RESULTS OF PRIOR MONITORING AND OTHER SITE VISITS:														
No significant findings	1							1		1	1		1	
Some minor findings	2	2		2	2		2		2					
Moderate findings or no prior audit	3		3			3						3		3
Some significant findings	4													
Many significant findings	5													
6. NUMBER OF PROGRAMS FOR PERIOD BEING MONITORED:														
Single	1													
2-4	2													
-5-	3													
6-7	4	4	4	4	4	4	4	4	4	4	4	4	4	4
8 and over	5	-т		<b>T</b>	<b>-</b>	<b>T</b>	<b>-</b>	<b>-</b>	<b>T</b>		<b>T</b>	<b>-T</b>	7	
Z FINIANIOIAL /DUDOFT IMADAOT.														
7. FINANCIAL/BUDGET IMPACT:	4													
Very little or no impact	1		0	0	0	0	0	0	0		0		-	
Little impact	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Moderate impact	3													
High impact	4													
Very high impact	5													
8. SIZE OF STAFF FOR PERIOD BEING MONITORED:														
Very Small (1-4)	1													
Small (5-8)	2													
Moderate (8-10)	3		3	3	3	3	3					3		3
Large (11-15)	4	4						4	4	4	4		4	
Very large (15 and over)	5													
9. MANAGEMENT INPUT/CONCERN:														
Very little	1													
Some	2	2					2	2	2	2	2		2	
Moderate	3		3	3	3	3					_			
Much	4		<u> </u>	3	<u> </u>	3						4		1
High	5											7		4
SUB-TOTAL	5	11	15	14	14	15	13	13	11	13	13	16	13	16
SUD-TUTAL		14	13	14	14	13	13	13	14	13	13	10	13	16

LOCAL WORKFORCE INVESTMENT AREAS		1	2	3	4	5	6	7	Я	9	10	11	12	13
LOOAL WORKI OROL IIIVLOTIVILIAT ARLAG				3	<b>-</b>	3	0			<u> </u>	10	- ' '		
Risk Categories	VALUES													
he TDLWD has received a waiver for this category for PY 13-14														
0. RESULTS OF COLLATERAL CONTACTS, CUSTOMER SURVEYS, ETC.:														
Zero or small indication of risk	1							1	1	1	1		1	
Some indication of risk	2	2				2	2							
Moderate indication of risk	3		3	3	3									
Large indication of risk	4											4		4
Very large indication of risk	5													
1. BOARD OF DIRECTORS INVOLVEMENT:														
Very active board (provides appropriate oversight)	1													
Active board (takes interest in financial matters														
review reports)	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Moderately effective	3													
Not very effective (Not sufficiently independent of														
management)	4													
Inactive board (does not meet regularly)	5													
2. EXPERIENCE WITH STATE/GOVERNMENT CONTRACTS:														
Over 10 years experience	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Five to ten years experience	2													
Two to five years experience	3													
Less than two years experience	4													
Completely new	5													
3. CHANGES IN EQUIPMENT SYSTEMS & STAFF SINCE LAST REVIEW:														
No changes	1	1	1	1	1	1	1		1	1	1	1	1	
Moderate changeslow turnover	2	<u> </u>	•		-	•	•	2	•	•	•	•	-	2
Equipment changeslow turnover	3							_						
High turnover	4													
High turnover & equipment systems change	5													

				7.0										
14. EXPOSURE TO LOSS:														
None	1													
Physical assets	2													
Readily negotiable	3													
Cash	4													
Confidential data	5	5	5	5	5	5	5	5	5	5	5	5	5	5
SUB-TOTAL		11	12	12	12	11	11	11	10	10	10	13	10	14
GRAND TOTAL RISK SCORE		39	41	39	40	40	38	38	38	37	36	44	36	45
** SEC 184 (a) 4 Monitoring : Each Governor of the state shall conduct on an An	nual basis o													10
the state of local government														
Summary of Risk Assessment														
LOCAL WORKFORCE INVESTMENT AREAS		1	2	3	4	5	6	7	8	9	10	11	12	13
	Ve	ery Low	Low	Low	Low	Low	Low	Low	Very Low		Very Low		Low	Mediu
Notes: Assumptions/Ratioanle:			20									modorato		
Federal Funds Expended during a fiscal year														
All LWIAs will bear the maximum risk for the federal funds expended (>\$300,000)														
2. Percent Expended of Federal Grants														
All LWIAs will expend greater than 50% grants														
3. Monitoring judgement risk														
Under SEC 184 (a) 4 Monitoring: Each Governor of the state shall conduct on an An	anual basis or	o cito ma	onitorin	a of oach		roo withi	n tha sta	to or loc	al govern	mont				
· · ·				y or eaci	LUCALA	Willin	TI THE STA		ai govern	THEIR.				
This monitoring judgement risk is weighted uniformly across all LWIAs; with emphas		e above	<del>).</del>											
4. Internal Control														
Uniform Average Control weight applied because of controls in practice.														
5. Results of prior monitoring and other site visits														
Self explanatory														
6. Number of Programs for period being monitored														
This indicates the range number of the main programs being monitored														
7. Financial Budget Impact								\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \						
The Financial Budget Impact falls into very Little (or no impact) and Little impact cate	egories; with	"fall bac	ck"local	governm	nent fund	s as sec	ondary to	WIA tu	nds					
8. Size of Staff for period being monitored														
The underlying assumption is that Small to Moderate staff will suffice under normal	circumstanc	es.												
9. Management Input/Concern														
Self explanatory														
10. Results of collateral contacts, customer surveys, etc														
Zero or small indication of risk to some indication of risk														
11. Board of Directors Involvement														
Self explanatory														
12. Experience with State/Government Contracts														
All LWIAs weighted uniformly														
13. Changes in Equipment Systems & Staff since last review														
Moderate changes - low turnover														
14. Exposure to loss														
Participant confidential data custodianship and management bears maximum risk.														
and the state of t														

#### **Corrective Action Plan Tracking Log**

	Date Mon.	Results of Monitoring Visits
Contractor	Report	July 1, 2013 - September 30, 2014
	Received	Bold (yellow fill)= unresolved
LWIA 1	8/22/2013	Unallowable costs charged to WIA Grant questioned cost (\$297.50)
LWIA 1	8/21/2014	No Finding Reported
LWIA 2	2/26/2014	<ol> <li>Expenditures were charged outside contract period.</li> </ol>
		<ol><li>Program funds were not used efficiently.</li></ol>
		<ol><li>Case management needs improvement.</li></ol>
LWIA 3	6/4/2014	No Findings Reported
LWIA 4	7/2/2014	Expenditures were charged to the contract prior to the contract period
		LWIA 4 failed follow the State Comprehensive Travel Regulations
		Procedures over equipment need improvement
LWIA 4	7/23/2013	No Findings Reported
LWIA 5	1/28/2014	Youth case management needs improvement
	0/5/0010	
LWIA 6	9/5/2013	OJT master contract did not contain two required clauses
		Cass management needs improvement
	6/20/2011	
LWIA 6	6/30/2014	1. LWIA failed to follow the State Travel Regulations.
		Two employees were overpaid. One by over \$5 and another by \$8.25.
		2. Case Management needs improvement.
		3 adult participants were coded as active
		but were not contacted for over a year.
LWIA 7	1/28/2014	Youth expenditures were over reported to TDLWD
LWIA /	1/28/2014	1. Touth expenditures were over reported to TDEWD
LWIA 8	7/12/2013	No Findings Reported
	77 = 27 = 2 = 3	The Fillianings Helperton
LWIA 8	4/24/2014	1. Contract Management needs improvement. Questioned cost\$741.60
	, , ,	2.Expenditures over reported \$190.00
		,,
LWIA 9	4/27/2013	1. Expense for personal cell phones were charged to the Grant.
		2. Youth participants had improper activity.
LWIA 9		No Findings Reported
LWIA 10	12/16/2013	1. Did not appear to be providing adequate follow-up
		services for participants
	- '	•

UOM AFLCIO	5/12/2014 7/17/2004	6. Case management needs improvement.  No Findings Reported  No Findings Reported
LWIA 13	9/22/2014	1. Reporting procedures need improvement. 2. Unallowable expenses were charged to grants. 3. LWIA 13 failed to comply with State Travel Regulations. 4. Discrepancies were noted in the participants payroll. 5. Procedures over property and equipment need improvement.
LWIA 13	9/20/2013	<ol> <li>Costs were incurred and reported prior to the beginning of the date of the contract period</li> <li>Unallowable expenses were charged to grants</li> <li>The appearance of a conflict of interested existed</li> <li>Did not comply with the LWIA 13's By-Laws regarding term limits for Board members</li> <li>Summer youth employment was utilized as a stand-alone activity</li> <li>Case Management needs improvement</li> </ol>
LWIA 12	11/14/2013	No Findings Reported
LWIA 11	7/12/2013	<ol> <li>Unallowable expenses changed to grants (\$56.89 and \$43.20)</li> <li>An agency vehicle used by employee for personal travel</li> <li>Expenditures charged to the contract were not within period availability. Questioned Cost \$24,775.89</li> <li>Vendor refunds were not used to reduce program costs.         <ul> <li>Questioned cost \$2,477.83</li> <li>Unallowable costs were charged to grants.</li> <li>Questioned cost \$1,775.26</li> </ul> </li> <li>Reporting Procedures need improvement.         <ul> <li>Questioned cost of \$1,092.76</li> <li>In kind match for the SCSEP was over reported.</li> <li>Procedure for allocating program costs need improvement.</li> </ul> </li> </ol>

N/A         N/A         N/A         NO         N/A           3/26/2014         3/14/2014         3/20/2014         No         6/2/2014           N/A         N/A         N/A         NO         N/A           7/2/2014         8/2/2014         Pending         No         N/A           N/A         N/A         N/A         No         N/A           2/27/2014         2/28/2014         3/11/2014         No         3/11/2014           10/4/2013         9/20/2013         10/18/2013         No         10/18/2013           6/11/2014         6/30/2014         8/25/2014         No         8/25/2014           2/27/2014         2/25/2014         3/11/2014         No         3/11/2014           N/A         N/A         N/A         N/A         N/A           5/24/2014         5/13/2014         5/30/2014         Yes         5/30/2014	Action Due Date LWIAs	Local C.A.P. Response	State Response Date	2nd review date LWIA	
3/26/2014 3/14/2014 3/20/2014 No 6/2/2014  N/A N/A N/A NO N/A  7/2/2014 8/2/2014 Pending  N/A N/A N/A NO N/A  2/27/2014 2/28/2014 3/11/2014 No 3/11/2014  10/4/2013 9/20/2013 10/18/2013 No 10/18/2013  6/11/2014 6/30/2014 8/25/2014 No 8/25/2014  2/27/2014 2/25/2014 3/11/2014 No 3/11/2014  N/A N/A N/A N/A N/A NO N/A  5/24/2014 5/13/2014 5/30/2014 Yes 5/30/2014	9/21/2013	8/31/2013	9/20/2013	No	9/20/2013
N/A	N/A	N/A	N/A	No	N/A
N/A       N/A       N/A       N/A       N/A         2/27/2014       2/28/2014       3/11/2014       No       3/11/2014         10/4/2013       9/20/2013       10/18/2013       No       10/18/2013         6/11/2014       6/30/2014       8/25/2014       No       8/25/2014         N/A       N/A       N/A       N/A       N/A         5/24/2014       5/13/2014       5/30/2014       Yes       5/30/2014					
N/A N/A N/A NO N/A  2/27/2014 2/28/2014 3/11/2014 No 3/11/2014  10/4/2013 9/20/2013 10/18/2013 No 10/18/2013  6/11/2014 6/30/2014 8/25/2014 No 8/25/2014  2/27/2014 2/25/2014 3/11/2014 No 3/11/2014  N/A N/A N/A N/A NO N/A  5/24/2014 5/13/2014 5/30/2014 Yes 5/30/2014	N/A	N/A	N/A	No	N/A
2/27/2014       2/28/2014       3/11/2014       No       3/11/2014         10/4/2013       9/20/2013       10/18/2013       No       10/18/2013         6/11/2014       6/30/2014       8/25/2014       No       8/25/2014         2/27/2014       2/25/2014       3/11/2014       No       3/11/2014         N/A       N/A       N/A       No       N/A         5/24/2014       5/13/2014       5/30/2014       Yes       5/30/2014	7/2/2014	8/2/2014	Pending		
2/27/2014       2/28/2014       3/11/2014       No       3/11/2014         10/4/2013       9/20/2013       10/18/2013       No       10/18/2013         6/11/2014       6/30/2014       8/25/2014       No       8/25/2014         2/27/2014       2/25/2014       3/11/2014       No       3/11/2014         N/A       N/A       N/A       No       N/A         5/24/2014       5/13/2014       5/30/2014       Yes       5/30/2014	N/A	N/A	N/A	No	N/A
6/11/2014 6/30/2014 8/25/2014 No 8/25/2014  2/27/2014 2/25/2014 3/11/2014 No 3/11/2014  N/A N/A N/A NO N/A  5/24/2014 5/13/2014 5/30/2014 Yes 5/30/2014	2/27/2014	2/28/2014		No	3/11/2014
2/27/2014 2/25/2014 3/11/2014 No 3/11/2014  N/A N/A N/A NO N/A  5/24/2014 5/13/2014 5/30/2014 Yes 5/30/2014	10/4/2013	9/20/2013	10/18/2013	No	10/18/2013
N/A N/A N/A NO N/A  5/24/2014 5/13/2014 5/30/2014 Yes 5/30/2014	6/11/2014	6/30/2014	8/25/2014	No	8/25/2014
5/24/2014 5/13/2014 5/30/2014 Yes 5/30/2014					
	IV/A	IN/A	IN/A	INO	IN/A
5/23/2013 5/23/2013 9/3/2013 Yes 9/3/2013	5/24/2014	5/13/2014	5/30/2014	Yes	5/30/2014
		5/23/2013	9/3/2013	Yes	9/3/2013
N/A N/A N/A NO N/A	5/23/2013				
1/2/2014 1/13/2014 3/11/2014 3/11/2014	5/23/2013 N/A	N/A	N/A	No	N/A

7/11/2013	8/9/2013	1/28/2014	No	1/28/2014
N/A	N/A	N/A	No	N/A
10/19/2013	10/18/2013	11/7/2013	Yes	5/6/2014
N/A N/A N/A	N/A N/A N/A	N/A N/A N/A	No No No	N/A N/A N/A
IVA	IV/A	IV/A	140	IV/A

Sub-recipient		
Reviewer	Date of review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

	Question	YES	NO	N/A	Parameters
1.	Is the Sub-Grantee familiar with the WIA requirements?				SCSEP is a required partner under WIA and is part of the One-Stop Delivery System and required to follow all applicable rules under WIA and its regulations
2.	Does a MOU exist between the sub-grantee and the WIA Local Board?				
3.	Are applicable SCSEP core services at the comprehensive Career Center outlined in the MOU?				
4.	Is there a referral process identified and described in the MOU?				641.220 SCSEP resources are to be used to provide SCSEP services to SCSEP eligible individuals. SCSEP is to refer ineligible individuals to the One-Stop Delivery System for services.
5.	Did the sub-grantee choose to arrange a reciprocal arrangement in the MOU?				arrangements can be negotiated between SCSEP and the One-Stop Delivery System to accept each other's assessment to determine need for services in SCSEP and Adult Programs under Title IB of WIA
6.	Does the sub-grantee distribute Career Center handouts to customers				641.210 SCSEP is required to make arrangements though the One-Stop Delivery System to provide eligible individuals with access to other activities carried out by WIA partners at the Career Center.
7.	Do the recruitment and selection procedures reflect the sub-grantee is seeking to enroll Minorities?				641.515 Each grantee or sub-grantee must develop methods of recruitment and selection that assure that the maximum number of eligible individuals will have an opportunity to participate in the program.
8.	Do the recruitment and selection procedures reflect the sub-grantee is seeking to enroll Limited English speaking eligible individuals?				641.515
9.	Do the recruitment and selection procedures reflect the sub-grantee is seeking to enroll those with the greatest economic need?				641.515
10.	Are Host Agency agreement files being maintained in accordance with SCSEP program regulations?				

Sub-recipient		
Reviewer	Date of review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

	Question	YES	NO	N/A	Parameters
11.	Is there feasible evidence that the sub-grantee is adhering to the priorities and preferences when examining participant characteristics?				In accordance with 641.520, subgrantees should select qualified individuals.
12.	Does the project have a waiting list?				641.520
13.	Do participant files show accurate computation of family income, using the inclusion and exclusion listed in the SCSEP Regulations?				641.530
14.	Is there a policy/procedure for immediate or 30-day terminations due to incorrect determination of eligibility?				641.530
15.	Is there a written grievance policy for complaint resolution for employees, sub-recipients, and participants				641.530
16.	Is there documentation in the file that the applicant was referred to other services when found ineligible for SCSEP services?				641.530
17.	When a participant is terminated for cause, is there proper documentation in the file?				641.530
18.	Is there documentation in the file that SCSEP participants are offered a free annual physical examination referral?				641.530
19.	Is the Confidential Income Statement used for both application and recertification?				641.530
20.	Is eligibility documentation in the participant files?				641.530

Sub-recipient_	
Reviewer	Date of review:
Executive Director Signature:	Fiscal Director Signature:
Date:	Date:

	Question	YES	NO	N/A	Parameters
21.	Is there an I-9 Employment Eligibility Form on file for each participant enrolled?				641.520
22.	Is orientation provided to new participants at the time of enrollment or prior to the first day at a host agency and compensated?				641.535 When Individuals are selected for participation in SCSEP, the grantee or subgrantee is responsible for providing the following.
23.	Is there an IEP in the file documenting a complete assessment and plan for the SCSEP participant?				641.535
24.	Is there documentation that the host agencies and supervisors have been provided orientation?				641.535
25.	Is there documentation that a Participant Handbook is provided to SCSEP participants?				641.535
26.	In the participant's file, is there a copy of the Participant Task Form dated and signed on or before the Participants first day at a host agency?				641.535
27.	Does the project assess each new participant to determine the most suitable SCSEP assignment for that individual?				641.535
28.	Is the assessment made in consultation with the participant and does it consider the individual's preference of occupational category, work history, skills, aptitudes, and potential for performing proposed community service duties?				641.535
29.	Does the assessment consider the potential for transition to unsubsidized employment?				641.535 .
30.	Does the project seek a community service employment assignment which permits the most effective use of each participant's skills and aptitudes?				641.535

Sub-recipient	
Reviewer	Date of review:
Executive Director Signature:	Fiscal Director Signature:
Date:	Date:

	Question	YES	NO	N/A	Parameters
41.	Does the project evaluate each participant to determine potential for transition to unsubsidized employment and the appropriateness of participant's current community service employment assignment?				641.535 -615-590 Grantee's and Sub-Grantee's responsibility to the SCSEP Participant
42.	Does the project develop alternate assignments, whenever feasible, if it is determined that a different community service employment assignment will provide greater opportunity for the use of the participant's skills and aptitudes, providing work experience which will enhance the potential for unsubsidized employment?				641.535 -615-590
43.	Are the assessments and evaluations required by this section documented and part of the participants file?				641.535 -615-590
44.	Is the Individual Employment Plan (IEP) developed within 3 months of enrollment for each participant and include the assessment?				641.535 -615-590
45.	Does the project evaluate the progress of the participant at least once a year?				641.535 -615-590
46.	Are there specific goals and completion dates included in the IEP?				641.535 -615-590
47.	Are progress review dates noted in the IEP?				641.535 -615-590
48.	Are there signed agreements between the participant and project in the file?				641.535 -615-590
49.	Is the original IEP maintained in the participant's file?				641.535 -615-590
50.	Are participants receiving daily supervision at training sites?				

Sub-recipient_		
Reviewer	Date of review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

	Question	YES	NO	N/A	Parameters
51.	Are supervisors ensuring that no participant works more than the compensated number of hours per day?				
52.	Are participants compensated for extra hours?				
53.	Are supportive services being provided to assist participants in subsidized and, where appropriate, in unsubsidized employment?				641.545 The grantee or sub-grantee may provide or arrange for support services to assist participants in participating in SCSEP such as paying transportation, healthcare/medical, job related i.e.: shoes, badges, uniforms, eyeglasses, tools, child care, adult care, temp shelter, and follow-up services cost.
54.	Are supportive services obtained at no cost or reduced cost to the program?				641.545
55.	Are grant funds used to subsidize participants transportation cost?				641.545
56.	Is transportation obtained at no cost or reduced cost to the program.				641.545
57.	Is training being provided in job seeking skills in preparation for unsubsidized placement?  Date the job seeking skills training was provided.				641.540 The grantee or sub-grantee must arrange skill training that is realistic and consistent with the participant IEP and that the most effective use of skills and talents. This does not apply to training received as part of a community service assignment.
58.	Is the assessment process being used to determine individual participant training/education needs?				641.540
59.	Has training/education been made part of the participants IEP?				641.540
60.	Are host agency community service activities provided, and clearly spelled out in the participant job description and IDP and not confused with training?				641.540

Sub-recipient	
Reviewer	Date of review:
Executive Director Signature:	Fiscal Director Signature:
Date:	Date:

	Question	YES	NO	N/A	Parameters
61.	Are training records kept in accordance with TDLWD/SCSEP policy?				641.540
62.	Have all training/education costs expended during the current year been described in a detailed sub-grant work-plan/budget or been approved in writing by the state coordinator?				
63.	Are participant meetings held quarterly and are they documented?				
64.	Are there documented copies of agenda and sign-in sheets for quarterly participant meetings?				
65.	Can the sub-grantee produce documentation of training hours being tracked on each participant?				
66.	Can the sub-grantee produce documentation of 6 month follow-up on all participants that have obtained unsubsidized employment?				641.555 For participants placed in unsubsidized employment, the grantee must make contact during the first 6 months to determine if support services are needed to remain in the job.
67.	Are customer satisfactions surveys on file for participants that have completed 30days of subsidized employment?				641.555
68.	Does it appear that the placement goal will be achieved by the end of the grant period?				641.560 Grantees are encouraged to work with the most difficult to place and refer job ready individuals to the Career Center.
69.	If there is a deficiency in meeting the goal is there corrective action documentation on what steps will be taken to meet the goal				641.560 .
70.	Was the unsubsidized placement goal met last year?				641.560

Date of review:	_
Fiscal Director Signature:	
Date:	
	Date of review:Fiscal Director Signature:

	Question	YES	NO	N/A	Parameters
71.	Are private and public sector employers contacted directly to identify and develop suitable job openings for SCSEP participants? Are these efforts being documented?				
72.	Are participants being referred to and attending Job Fairs/Job Clubs/WIA One Stop System been used to assist in meeting placement goal.				
73.	Is job search assistance being provided to participants?				
74.	Is follow-up being conducted with the participant within the first six months to determine if support services are needed to maintain employment?				
75.	Is follow-up being conducted with the participant to establish placement and delivery of customer service survey if applicable?				
76.	Do follow-ups conform to USDOL requirements?				
77.	Are initial physical examinations offered to each participant?				641.565 Participants wages are based on the highest applicable minimum wage for time spent in orientation, training, and work in community services assignments.
78.	Are additional physical examinations offered at least once a year or before fifteen continuous months?				
79.	Are physical examinations obtained at no cost to the project whenever possible ?				
70.	Has the maximum duration of enrollment been established and approved in the grant agreement?				641.570

Sub-recipient	
Reviewer	Date of review:
Executive Director Signature:	Fiscal Director Signature:
Date:	Date:

	Question	YES	NO	N/A	Parameters
81.	Has a limit on the amount of time at each agency been established and approved in the grant?				establish a limit on the amount of time its participants may spend at each agency. Such limits should be established in the grant agreement and reflected in the IEP.
82.	Does the sub-grantee have a termination policy on file?				614.580
83.	During orientation and throughout participation, are participants informed and reminded of the non-employment status of community service activities?  Is the project over-enrolled?				641.590
84. 85.	Is the project over-enrolled?  Is the project monitoring spending levels during the grant				
00.	year?				
86.	Is there a procedure in place that governs implementation of the provision against activities utilizing SCSEP funds?				641.833 – 641.836
87.	Is there documentation that SCSEP staff and participants are informed that they are prohibited from participating in political activities while on the job?				
88.	Are project funds used in any way to support union activity?				641.839 No funds provided under the Act may be used in any way to assist, promote, or deter union organizing.
89.	Are any participants paying union dues?				
90.	Is the project ensuring for it and host agencies conformance to nepotism requirements?				674.841 No grantee or sub- grantee may hire, and no host agency may be a work site for a person who works in an administrative capacity, staff position, or community service position funded under Title V or this part if a member of that person's immediate family is engaged in a decision-making capacity (whether compensated or not) for that project, subproject, grantee, sub-grantee or host agency.

Sub-recipient	
Reviewer	Date of review:
Executive Director Signature:	_Fiscal Director Signature:
Date:	Date:

	Question	YES	NO	N/A	Parameters
91.	Does the project have written personnel policies and procedures to include grievance procedures?				establish, and describe in the grant agreement grievance procedures for resolving complaints, other than those which cannot be resolved within 60 days under the grantee's procedures, may be filed with the Chief, Davison of Older Worker Programs, E & T Administration, U.S. Department of Labor, 200 Constitution Ave., N.W. Washington, D.C. 20210
92.	Are grievance procedures followed?				
93.	Have any complaints been filed this grant year?				
94.	Are complaints documented and filed?				
95.	When a project decides to take adverse action against a participant, does the Project Director notify the state coordinator prior to taking any action?				
96.	Was adverse action initiated against any participants during the previous program year?				
97.	Have there been any reports or accusations of suspected discrimination brought to the attention of project staff?				
98.	Have all project staff been trained in ensure compliance with ADA?				
99.	Does the project ensure that nondiscrimination assurances are included in all contractual agreements?				
100	Is there documentation reflecting that host agencies is aware of the Maintenance of Effort requirements?				641.844 Maintenance of Effort

recipient	
Reviewer	Date of review:
Executive Director Signature:	Fiscal Director Signature:
Date:	Date:

	Question	YES	NO	N/A	Parameters
101.	Are participants' working assignments a substitute for non-Title V work that should be performed by the regular employees of the host agency?				
102.	Are there any MOE violations?				
103.	Are the expenditures charged to Title V reasonable (based on allocation formula)?				641.884 SCSEP recipients must follow the grant closeout procedures at 29 CFR 97.50 or 29 CFR 95.71 as appropriate. TDLWD will issue closeout instructions to projects as necessary.
104.	Does the accounting system have cost codes to separate Title V from other programs?				
105.	Does the project have a system for allocating cost to the appropriate cost category?				
106.	Does the project have a system for monitoring planned vs. actual cost and for taking corrective action?				
107.	Has the project earned any program income?				
108.	Does the Project Office accounting system provide adequate cost data to the Project Director?				
109.	Did the project comply with all closeout procedures required by the Legal Agreement?				·
110.	Has the project submitted accurate monthly and quarterly financial reports on a timely basis?				

recipient		
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	Question	YES	NO	N/A	Parameters
111.	Do all financial reports include accruals?				
112.	Does the sub-sponsor charge indirect cost to the grant?				
113.	Does the sub-sponsor use an approved indirect cost rate for charging indirect cost to the grant?				
114.	Does the rate agreement cover the period of performance for the current grant?				
115.	What is the rate?				Rate:
116.	Were there any administrative findings in the last audit report?				
117.	Has the project taken corrective action to resolve the findings?				
118.	Has a final Findings & Determination (F&D) been made?				
119.	Were any cost disallowed?				·
120	Is staffing in accordance with approved contract agreement and budget?				

Date of review:	
Fiscal Director Signature:	
Date:	
	Date of review: Fiscal Director Signature:

	Question	YES	NO	N/A	Parameters
121.	Are job descriptions available?				
122.	Does the project maintain on-site Organizational Charts?				
123.	Does the project maintain on-site Position Descriptions?				
124.	Does the project maintain on-site Time Sheets?				
125.	Are there posting of appropriate posters (political activity limitation, EEO, etc.) in the project office?				
126.	Is there documentation that the project is continuing to seek out new Host Agencies?				
127.	Has the project provided orientation and training to host agencies?				
128.	Is the project following plan of action as outlined in the Grant Narrative?				
129.	Has the staff implemented recommendations for any corrective action?				
130.	Are members of the staff familiar and knowledgeable of the Grant's plan of action?				

Sub-recipient_		
Reviewer	Date of review:	
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Date:	Date:	

	Question	YES	NO	N/A	Parameters
131.	Are the monthly and Quarterly, Financial and Programmatic, Reports submitted to the TDLWD accurately and in a timely manner?				
132.	Are there consecutive time sheets properly signed for each preceding pay period?				
133.	Is there evidence that a wage of at least the current Federal or State minimum wage, whichever is higher is being paid participants?				
134.	Are hours worked tracked cumulative?				
135.	If applicable, are annual and /or sick leave time accrued accurately and are records kept?				
136.	Are there two valid signatures (Participant and Supervisor) on each time sheet?				
137.	Does the participant file contain the Applicant/Participant Form jointly signed by the applicant/participant & interviewer?				
138.	Does the participant file contain the Community Service Form?				
139.	Does the participant file contain the Confidential Income Statement jointly signed by the applicant/participant & interviewer?				
140.	Does the participant files contain the Recertification				

Sub-cipient	
Reviewer	_Date of review:
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Date:	Date:

	Question	YES	NO	N/A	Parameters
141.	Does the participant file contain the Applicant's Confidential Statement at Recertification?				
142.	Does the participant file contain the Initial Assessment Form?				
143.	Does the participant file contain the Annual Assessment?				
144.	Does the participant file contain the Individual Employment Plan?				
145.	Does the participant file contain Goals, Support Services, and Training?				
146.	Does the participant file contain the IEP Follow up/Review?				
147.	Is the physical, reexamination, and/or waiver kept separately according to ADA requirements?				
148.	Is there an exit form present?				
149.	Does the participant file contain the proper documentation when there is Termination for cause?				
150.	Does the participant file contain Unsubsidized Placement Follow-up?				

Sub-recipient_	
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Date:	Date:

	Question	YES	NO	N/A	Parameters
151.	Was there a Participant Training Description at the Host Agency?				
152.	Has the project established written policies relating to compensation for scheduled work hours during which an applicant's or sub-recipient's business is closed for Federal Holidays?				
153.	Do you have the orientation documentation on the Host agency?				
154.	Do you have the orientation documentation on the Grievance Procedure?				
155.	Are there records of Supportive Services including Quarterly participant meetings, job seeking skills training, etc.				
156.	Are the Participant Performance Evaluations on file?				
157.	Are the Host Agency and Participant documents on file?				
168.	Is there a monitoring form on file ?				
159.	Are Host Agency File Verifications included?				·
160.	Does the Host Agency Agreement included the FEIN?				

Sub-recipient_	
Reviewer	_Date of review:
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Date:	Date:

	Question	YES	NO	N/A	Parameters
161.	Do the files contain required copies of source documentation to prove Age, Income Sources, and Family Size?				
162.	Do the files contain a copy of the income tax form?				
163.	Does the project have adequate public liability and other appropriate forms of insurance as stated in the Grant Agreement?				
164.	Does the project have Workers' Compensation Insurance?				
165.	Does the project have Occupational Diseases Insurance?				
166.	Does the project have Employer Liability Insurance?				
167.	Does the project have General Liability Insurance?				
168.	Does the project have Automobile Liability Insurance?				
169.	Are there written travel procedures?				·
170.	Do the travel expenses charged to the sub-grant meet the requirements of the Grant?				

Sub- recipient		
Reviewer	Date of review:	
Executive Director Signature:	Fiscal Director Signature:	
Date:	Date:	

	Question	YES	NO	N/A	Parameters
171.	Does the project have a copy of the latest Equitable Distribution Plan?				
172.	Does the project have a copy of the latest State Plan?				
173.	Is the sub-grantee using the IEP in determining when it is appropriate to rotate participants through assignments, with the goal of achieving unsubsidized employment?				
174.	Is there a written policy setting forth actions to be taken to deal with those found to be ineligible, including notification of their right to appeal the finding?				
175.	Is the project obtaining a written waiver from each participant who declines to have a physical?				
176.	Has the project established written policies relating to necessary sick leave that is not part of an accumulated sick leave program?				
177.	Is there an IEP Termination policy on file?				
178.	Has the IEP Termination policy been approved by DOL?				
179.	Are participant files being maintained for 3 years after the program year in which all follow-up activity for a participant has been completed?				·
180.	Are participant records securely stored an access limited to appropriate staff to safeguard personal identifying information?				

Sub-recipient	
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	Question	YES	NO	N/A	Parameters
181.	Are quarterly Narrative Reports being sent no later than the 10 <sup>th</sup> after each quarter to TDLWD?				
182.	Has the project provided the administrative office with an MOU specifying how services will SCSEP services are provided by SCSEP partners?				
183.	Are medical records and criminal background checks being kept separate from participant files?				
184.	Are quarterly Progress and Narrative Reports being sent no later than the 10 <sup>th</sup> after each quarter to TDLWD?				
185.	Has the project provided the administrative office with an MOU specifying how services will SCSEP services are provided by SCSEP partners?				
186.	being kept separate from participant files?				
187.	Are SCSEP participants being assessed for computer literacy training? Is it documented in the participant file?				
188.	If it has been determined that the participant lacks basic computer skills are they referred to computer literacy training. Is there documentation in the participant file?				
189.	Are participants that have been documented as Job Ready turning in the required Job Searches?				
190.	Are participants that have been documented as Job Ready referred to a TN Career Center for registration assistance with the JOBS4TN website?				
191.	Is the Participant Services flow chart on file?				
192.	Is the Participant Services flow chart being used in the delivery of SCSEP Services?				